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FROM: J. Tyler McCauley *tm*  
Auditor-Controller

SUBJECT: **MANAGEMENT AUDIT OF THE DEPARTMENT OF REGIONAL  
PLANNING**

Attached is the management audit of the Department of Regional Planning (DRP or Department). The audit was performed by Strategica under contract with the Auditor-Controller's office.

Strategica reviewed the Department's organizational structure, staffing, budget, administrative costs, and processes to provide the basis for recommendations for improving the effectiveness and efficiency of program operations and service delivery.

**Summary of Findings**

The Department oversees the majority of its operations in a satisfactory manner and over the last several years has made some improvements to strategic processes and operational and information systems. However, management has not aggressively identified and/or implemented necessary changes in some strategic areas of operation such as customer service, information technology, and project oversight (including interagency coordination). As a result, DRP still faces significant challenges in these areas, as noted below.

**Customer Service**

The number of locations and hours that DRP staff are available to provide customer service is limited. The public counter located in the Hall of Records, which is the main point of the Department's customer service, is staffed from only 1:00 to 6:00 p.m. Monday through Thursday. Also, eight of nine of the field office locations are staffed for only four hours each week. In addition, the Hall of Records location is a distance for

most customers to travel and parking in the area is limited and expensive. The auditor recommends that DRP organize for improved customer service by developing a strategy for deploying staff, functions and services in the field closer to the unincorporated areas and the Department's customer base, and by expanding operating hours.

### **Current Planning**

A frequent concern from DRP customers is the length of time it takes to get an application approved. The auditor found that DRP's project approval process is fragmented and does not assign responsibility for project oversight. Responsibility for projects is passed from one section of the Department to another as different stages of the review process are completed. This fragmented approach in approving new projects is a serious hindrance to expeditious processing of cases. The auditor recommends that the Department implement a comprehensive project manager approach to project reviews. In this model, one person handles a project from the initial review stage through the approval hearings and implementation monitoring.

In addition, to address periodic backlogs, the auditor recommends that DRP hire consultants or additional former DRP staff to handle cases.

### **Interagency Coordination**

The auditors found DRP does not have an effective system in place to ensure its code enforcement and inspection efforts are coordinated with the code enforcement and inspection efforts of other County departments. The auditor recommends that the Department establish cross-agency teams to address the worst or most recalcitrant offenders. Additionally, the auditor found the Department can enhance inter-agency coordination over the monitoring of conditions of approval or mitigation measures through the implementation of the same information technology system (KIVA) currently being implemented by the Department of Public Works (DPW). These conditions and measures are imposed by several County departments, including DRP, Department of Parks and Recreation, Department of Public Works, and the Fire Department. Verifying that conditions have been satisfied through the inspection process is the responsibility of each agency that imposed the conditions. However, the decentralized inspection process among departments reduces each department's accountability and may result in confusion about which department is responsible for ensuring compliance.

### **Information Technology**

The Department has been successful in obtaining funding from the County Chief Information Officer (CIO) for converting the Department's maps to GIS, a project called the "Zoning Map Conversion and Integration Project." The project is a partnership between DRP and DPW, with DRP providing project management and staffing and DPW providing staff and financial support. The project involves converting zoning

information contained in maps onto a common GIS platform for ready access by DRP, DPW and other County staff and, eventually, the public.

The project was approved by the CIO in January 2002 and the initial timeline called for DRP to hire staff by June 2002 to coordinate the work of outside contractors who would actually perform the necessary digitizing. As of the time of this analysis, no action had been authorized by DRP management to begin the process of hiring the necessary staff resulting in the project being at least three months behind schedule. Subsequent to the analysis, additional staff has been assigned, but DRP will be facing a two to three-year period during which zoning changes will only be updated manually before GIS is rolled out.

### **Human Resources**

Staffing at DRP was particularly hard hit during the County's financial difficulties of the early 1990s. Agency staffing was reduced from approximately 200 to fewer than 90. Although the auditor found the Department has been successful in incrementally rebuilding staff over the last several years, the Department is also faced with a high number of impending retirements. Two-thirds of the Department's managers and section heads have at least 25 years of County experience. The auditor recommends that the Department develop a strategic succession plan to ensure it minimizes, to the extent possible, the loss of managerial and institutional knowledge in the next few years.

### **Recommendations and Funding**

The report contains recommendations to modernize the Department's operations and improve the delivery of customer service to County residents, update zoning ordinances, automate systems that have outlived their usefulness, and enhance inter-agency coordination and enforcement of the County's land/building use ordinances. The Department indicated that it will calculate the costs to implement each recommendation and intends to include these costs in future budget requests. A small portion of the additional funding can be generated by the Department developing new fees for services and appropriately increasing existing fees. However, DRP cannot implement the key recommendations in the strategic areas of operation noted above without additional funding.

### **Acknowledgment**

On December 12, 2002, we met with the Planning Director and Chief Deputy to discuss the report. Their initial response is attached to the report. The Department concurs with many of the findings and recommendations contained in the report and will provide a detailed response to your Board in 90 days, including a strategy to implement the recommendations.

We thank DRP management and staff for their cooperation and assistance during this review. Please call me if you have any questions, or your staff may contact DeWitt Roberts at (626) 293-1101.

JTM:DR:DC

Attachment

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*Management Audit  
of the Los Angeles County  
Department of Regional Planning*

January 2003

Presented to J. Tyler McCauley  
Los Angeles County Auditor-Controller

Prepared by:



**STRATEGICA**

in association with:

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## LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING RESPONSE

# I. EXECUTIVE SUMMARY

## Overall Assessment

The strategic direction of the Department of Regional Planning (DRP) during the last three to four years has been to 1) recover from the effects of layoffs that occurred in the 1990s, 2) expand the scope of the zoning enforcement services to cover the entire County, and 3) overhaul selected elements of the agency such as the Zoning Ordinance and document management systems. In the past two to three years, in a time of steadily increasing budgets, DRP has made improvements to processes and systems that over time, have become outmoded on a macro scale.

The agency is also handicapped by economic cycles. As the local economy peaks (as in the late 1980s) and ebbs (as in the mid-1990s) County budget allocations can vary, forcing deferral of capital improvements and layoffs. Until FY 97/98, Net County Cost (NCC) directed at the agency was down 55% from the early 1990s and revenues did not fully recover until FY 99/00. Although the agency has been bouncing back recently, it is still held back. Management has not aggressively identified and/or implemented necessary changes in the technology, process, HR, customer service and policy areas:

- An outmoded Zoning Ordinance,
- A customer service interface that is inconvenient to customers in terms of location, wait times, phone service, etc.,
- Fragmented current planning processes,
- Automated systems that have outlived their usefulness (and the careers of those who supported them),
- A rapidly aging corps of managers and technicians with a shortage of candidates to replace them,
- A fragmented approach (Countywide, not just at DRP) to ensuring compliance with conditions of development, and
- Maps and records that are not secure from theft or fire and have no backup.

DRP has programmed improvements and service enhancements for some of these issues into its core planning documents such as the Business Automation Plan and the annual budget requests, yet have not been able to bring these plans to fruition. The agency has opted for more incremental moves, more analysis or waiting for additional budget resources.

In addition, the core agency planning documents, when viewed in their entirety, do not demonstrate that an overall strategy is in place. For example, the Business Automation

Plan, comprising several worthy projects, does not fully support or reconcile with the overall strategic plan.

Using this management audit as a catalyst, the management of DRP and County policy makers should formulate bold steps and strategies for modernizing the agency. Although the Department is calculating the costs associated with full implementation, the Department can not implement many of the recommendations without additional funding. A small portion of the additional funding can be generated by developing new fees for services, such as small plan checks and one-stop meetings. In addition, the Department, should review existing fees and surcharges, such as permit processing, and investigate the appropriateness of increasing them to provide on-going funding to modernize the Department's critical planning processes.

## Overview of the Los Angeles County Department of Regional Planning

The Department of Regional Planning (DRP):

- Establishes and maintains a continuing comprehensive long-range process for the physical, social and economic development of the County,
- Prepares and maintains Area and Community plans,
- Administers the County's subdivision and Zoning Ordinances through reviewing development and permit applications for consistency with the ordinances,
- Develops and maintains a base of information on land use and development conditions within the County,
- Responds to zoning violations, and
- Develops programs to encourage the realization of the County General Plan.

The mission of the DRP is:

"To improve the quality of life through innovative and resourceful physical and environmental planning, balancing individual rights and community needs."

DRP has 125 budgeted positions and operates with a budget of \$13 million. Thirty-nine percent of their financing needs are primarily covered by revenues from permit fees and other charges for services. The remainder is financed from the County's General Fund.

The three major services provided to customers are:

1. **Advance Planning** is concerned with guiding development and growth in the County, revitalizing communities and improving the quality of life for County residents. The Advance Planning Division uses tools such as the Countywide General Plan, Community and Area plans and various ordinances to implement their mission.
2. **Current Planning** involves processing entitlement applications including a variety of discretionary permits, land division applications, lot line adjustments, certificates of compliance, privately initiated zone reclassifications and plan amendments and the related environmental review.

3. **Land Use Regulation** responds to violations of the Zoning Ordinance. This is accomplished through an intensive program of inspection and follow-up, logging violations and, occasionally, criminal prosecution.

In addition, these services are supported by the Technical and Fiscal Services Division that provides HR, IT and finance functions.

## Accomplishments

In addition to the day-to-day accomplishments of preparing ordinances, reviewing development applications, and investigating zoning violations, DRP has also implemented a number of significant improvements over the past five years:

- Prepared or initiated several key planning products including the Santa Monica Mountains North Area Plan, housing and safety elements of the Countywide General Plan, Community Standard Districts in several areas in the County, and Transit-Oriented Districts,
- Completed the WEBTRACK system allowing internet access to case information,
- Initiated joint area planning arrangements with adjacent cities, and
- Implemented a Countywide Geographic Information System (GIS) including aerial photos.

## Findings and Recommendations

### Customer Service

The main point of customer service at DRP is the counter in the 13<sup>th</sup> floor of the Hall of Records. This counter is staffed from 1:00 to 6:00 Monday through Thursday. The mornings are devoted to fielding telephone calls. The entire Department is on a 4/40 schedule (i.e., working 40 hours during Monday through Thursday) so they are not open on Fridays.

In addition to the downtown counter, DRP staffs public counters at nine field offices run by the Department of Public Works (DPW). These field offices are typically staffed one morning or afternoon a week. The majority of the field offices are left unstaffed by DRP. Out of 100 potential working shifts among the ten offices (i.e., ten offices x five working days x two shifts per day), only 14 shifts are staffed or 14% of the total.

At one time, field offices were staffed on a more consistent basis. However, due to staffing cuts in the 1990s and the increasing emphasis on zoning enforcement, staffing levels in the field offices have not recovered and do not meet the current level of demand. Budget requests and other Departmental planning documents (e.g., strategic plan) in the last couple of years have included plans for increasing field office staffing. DRP has also been in discussions with the County Chief Administrative Office (CAO) regarding augmenting increased staffing as part of a broader Countywide economic development strategy. Thus far, these plans have not been realized.

This intermittent staffing pattern has several consequences:

- Out in the field, customers and members of the public must be aware that staffing is intermittent and know which day they need to arrive.
- Customers and members of the public that come to the Hall of Records frequently arrive in the morning and must either return later or wait until 1:00 p.m. when the doors are open.
- When customers go to field offices during days when DRP staff are not present they rely on DPW staff to answer their questions. Frequently these questions pertain to zoning issues (e.g., setbacks, building height). In the past, DPW staff would attempt to answer the simpler zoning questions but this practice has been curtailed due to the increasing complexity of the Zoning Ordinance, particularly those sections dealing with Community Standard Districts.

Compounding the limited hours is the distance that customers must drive. Of all the unincorporated areas in the County, only East Los Angeles is within five miles of the Hall of Records. Most of the unincorporated areas and the customers that work or reside there are located long distances from downtown Los Angeles.

Despite these logistical difficulties, we observed that DRP staff provide excellent service at the public counters. The majority of customer transactions that we observed at the counters were handled promptly (once the customer's turn for service came) and in a courteous manner.

## **Recommendations**

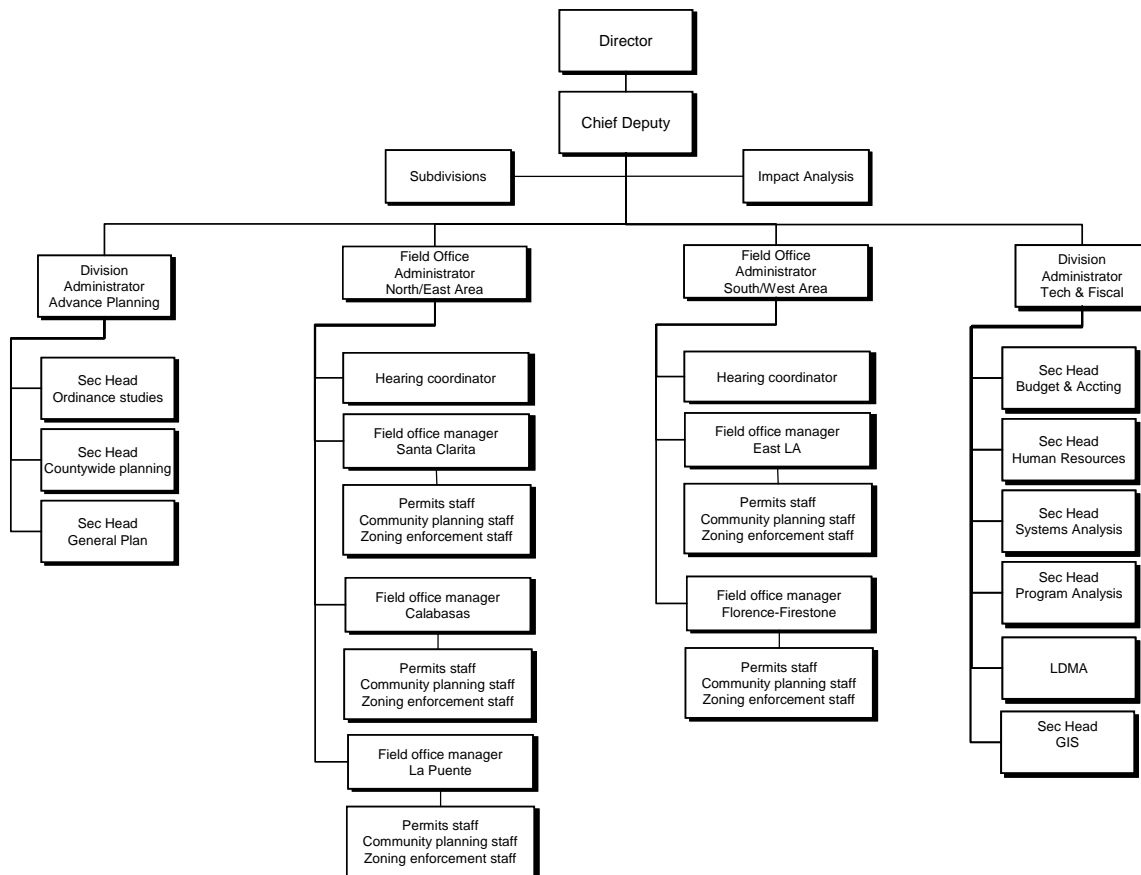
DRP should develop a strategy to deploy staff, functions and services to the field closer to the unincorporated areas and the agency's customer base using the seven-step process identified in our report, which includes:

1. Moving zoning code enforcement agents out to the field offices. Assign them to handle code enforcement tasks in the areas served by the field offices.
2. Transitioning to the KIVA<sup>1</sup> system as it goes into full production and replaces CTRK.
3. Transitioning current code enforcement staff to public counter and current planning tasks in the field offices with the objective of backfilling planning positions as planners are promoted or as they replace retiring managers.
4. Implementing KIVA website features.
5. Bringing GIS up with all zoning designations, current permits and parcel history. Connect field offices to GIS.
6. Moving Permitting, and Community Planning staff from the Hall of Records to field offices. The Regional Planning Commission would continue to meet downtown. Administrative staff should remain downtown in order to support all the field offices.
7. Once Hall of Records walk-in traffic declines suitably, closing down the public counter.

The organizational chart shown on the next page offers an alternative for implementing this recommendation. DRP should evaluate and implement this alternative or something similar.

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<sup>1</sup> KIVA is not an acronym. It is a brand name for a case tracking software product produced by the Accela Corporation. KIVA is named after a ceremonial structure used by Southwestern Pueblo Indian tribes.

**Figure E-1: Proposed Organizational Structure**

## Advance Planning

The current version of the General Plan was adopted by the Board of Supervisors in 1980. Since that time, the General Plan has been relatively static with some exceptions such as the Housing Element that must be updated every five years pursuant to State law. The safety element was also updated recently to account for new seismic safety standards. DRP has recently begun a comprehensive update of the General Plan that will include all required elements such as circulation, safety and land use.

Complementing the Countywide General Plan, the County also has 12 adopted Community and Area plans. Many of these plans were prepared in response to requests by communities to implement specific land use standards that were not available from a more generic document such as the General Plan. Many of the Community and Area plans in existence date from the mid-1980s and have not been updated since.

Many of the communities in unincorporated Los Angeles County have continued to evolve in the last ten to 15 years since many of the plans were developed. Meanwhile the County's General Plan is currently being updated but the land use element update will not include those areas covered by Community or Area plans.

Title 22 of the County Code, the Zoning Ordinance, was first adopted in 1927. Since that time, hundreds of amendments and overlaying ordinances such as Community Standard Districts have reshaped Title 22 and added a high level of complexity. The Zoning Ordinance is widely criticized for being difficult to interpret or reconcile with other planning documents.

In addition to having problems in organization and interpretation, the ordinance does not incorporate new concepts in land use regulation such as performance-based zoning. Performance-based zoning does not attempt to address every conceivable land use or type of business, rather it relies on defining the allowable impacts of a land use. Performance-based zoning reduces restrictions on land use from traditional zoning and facilitates redevelopment and more creative use of land without creating negative impacts. Performance-based zoning can be difficult to implement but is recognized as a viable concept and is catching on in various jurisdictions around the nation.

DRP budget requests in the past couple of years have included Zoning Ordinance overhaul projects, but despite increased budget allocations the project has not proceeded. During the summer of 2001, DRP drafted a plan to comprehensively revise the Zoning Ordinance. This plan seeks to improve consistency among the various planning documents, improve the intelligibility and ease of use, enhance the flexibility of zoning and the ability of the ordinance to respond to changing conditions, and incorporate public input into the revision process. The revision is a two-year process. Implementing this revision would require dedication of DRP staff and retaining outside consulting help. The agency's new strategic plan makes no mention of a Zoning Ordinance revision.

## **Recommendations**

### **Complete the General Plan update**

DRP should complete the ongoing update of the Countywide General Plan. This process, begun in 2001, will incorporate current land use, transportation and other quality-of-life issues into the County's overall vision for growth and development.

### **Prepare a program for updating existing Community/Area plans and creating new Community/Area plans**

DRP should prepare a program for updating existing Community and Area plans and creating new plans. Existing plans should be updated in a systematic fashion following the adoption of the updated Countywide General Plan to ensure that land use issues for all unincorporated areas are analyzed and addressed.

### **Revise the County Zoning Ordinance**

DRP should implement the Zoning Ordinance Revision program drafted during the summer of 2001. The Board of Supervisors should allocate additional funds for this purpose. DRP should hire a consultant to assist in the update and dedicate two Advance Planning staff full-time to the revision. The revision should also include new procedures for navigating, interpreting and implementing the Zoning Ordinance (e.g., how to notice residents, find out what a property is zoned, etc.). The revision should also incorporate new concepts such as performance-based zoning to facilitate more flexibility in land use and redevelopment.

## Bring zoning into consistency with the updated General Plan and Community/Area plans

In conjunction with the Zoning Ordinance revision, the zoning map should be revised to be consistent with the updated General Plan and Community and Area Plans. The map update should also be conducted after parcel-level zoning designations are input into the Department's GIS. This process will avoid any consistency challenges from members of the community.

## Current Planning

A frequent concern from applicants is the length of time it takes to get an application approved. There are numerous small steps in the project approval process, each adding to the time delay. Figure E-2 indicates key steps in the review process for use permits and subdivisions heard by the RPC and the amount of time each step presently takes and what is being recommended as the ideal timeframe based on best practices.

Figure E-2 – Process Timelines

Process	Existing <sup>2</sup>	Required <sup>3</sup>	Recommended <sup>4</sup>
One-stop meeting request until date of meeting	6-8 weeks		2 weeks
Application submittal meeting request until date of meeting	4-6 weeks		2 weeks
Application submittal until date application is reviewed for completeness	4-6 weeks	30 days	4 weeks
Date application deemed complete until Planning Commission hearing	6-12 weeks	60 days <sup>5</sup>	6 weeks
Public hearing to final action	6-10 weeks		3-4 weeks

Sources: Los Angeles County DRP and Zucker Systems

A key issue is the fragmented nature of the process. In the current process no one person takes ownership for a case. Instead, overall responsibility for the expeditious processing of a case falls on several players. The one-stop session, if held, is managed by staff from the Land Use Regulation Division although planners from other divisions may attend. Once an application is submitted, a planner from the permits or subdivision section takes control. If the project is subject to the California Environmental Quality Act (CEQA), the impacts analysis section takes control. In addition, professionals in other County departments review the submittal. The responsibility for ensuring that the case is moved ahead and that all relevant analysis and reviews are performed on time is fractured. This lack of overall case ownership is a serious hindrance to expeditious processing of cases. Other jurisdictions have implemented measures to build up case ownership, notably assignment of

<sup>2</sup> DRP's case planning system, CTRK, cannot produce reliable data documenting case processing timelines. These figures are based on staff estimates.

<sup>3</sup> Required per the State Permit Streamlining Act, Government Code 65920 et Seq.

<sup>4</sup> Recommended timelines are based on observed industry best practices.

<sup>5</sup> Sixty days for permits that do not require an Environmental Impact Report either because they are categorically exempt or there is a negative declaration.

case coordinators, administrators who monitor the progress of cases, or project managers, planners that oversee the whole review process in addition to reviewing the case.

## **Recommendations**

### **Implement measures to improve processing timelines including:**

- Schedule additional one-stop meetings if backlogs become a problem,
- Applications should be processed and transferred to planners within 24 hours,
- Integrate the environmental review process with the subdivision review meeting,
- Have zoning permit planners perform preliminary environmental reviews,
- Limit other agency reviews to 15 days,
- Conduct a pre-application process for Conditional Use Permits (CUPs) especially those that are bound for the RPC, and
- Convert use permits to minor permit status that can be processed with a directors review.

### **Hire former DRP staffers or consultants to address periodic backlogs**

In order to address periodic backlogs, DRP should establish a list of prequalified consultants and former DRP employees, such as retirees or those leaving for parenting reasons, to handle cases.

### **Implement a comprehensive project manager approach to project review**

Project managers should manage all aspects of a project including environmental assessment. When a project is assigned to the planner, he/she should handle it from the initial review stage through the approval hearings and implementation monitoring. Planners acting as project managers should be responsible for expediting the project through all its necessary approvals including those required by other County agencies.

Prior to and concurrent with the implementation of the project manager system, Current Planning should establish a cross-training program, which should assist the planners' transition into project managers.

### **Change role of Impact Analysis to provide support for case planners**

The Impact Analysis Section should be in the forefront of developing a modified environmental review structure for Current Planning. The goal should be to provide the case planners in Land Divisions and Zoning Permits the appropriate assistance in the environmental review field so that they can transition to a "project manager" role overseeing the entire review process.

The focus of the Impact Analysis Section should change to provide expert assistance on environmental issues for planners in the case processing sections. The Impact Analysis Section should continue to be in charge of Environmental Impact Reviews (EIRs) and special environmental studies. They should also prepare guidelines and development standards that will allow for easier environmental assessments.

## Zoning Enforcement

### Enforcement Processes

DRP has a large unit of enforcement agents that are charged with achieving compliance with the County's Zoning Ordinance. The County relies on three methods to achieve compliance with the Zoning Ordinance:

1. Persuasive discussions from enforcement agents,
2. The threat of fines, and
3. The threat of criminal prosecution.

Persuasion is very effective and results in most cases being closed within a few months. The DRP enforcement staff deserves credit for their reasoned, persuasive, professional approach to dealing with violators. In the minority of cases when persuasion doesn't work, the agency relies on fines and criminal prosecution.

Fines and prosecution are not as effective as they could be. The Department makes minimal effort to collect noncompliance fees. The agency also does not track or account for outstanding fines nor could the agency provide a reliable estimate. Noncompliant property owners simply receive another letter rather than collection efforts.

Criminal prosecution could be a powerful tool if it was utilized more. Many perpetual violators correct the noted code violations when presented with the threat of criminal indictment. The Department must rely on the County District Attorney to file criminal complaints against violators. In FY 01-02, approximately 50 cases out of a total of 3,300 were referred to the District Attorney.

In some cases, persuasion and threats of criminal prosecution are to no avail. This frequently happens when the violation is not pursued through the criminal justice system. These cases are kept on the books and revisited periodically through follow-up inspections.

### Continuity and Case Tracking Systems

DRP's case tracking system, CTRK (pronounced C-TRACK), has no capability for automatically identifying and listing cases that need attention so it becomes easy to let cases fall through the cracks. This is a problem when an enforcement agent leaves the Department or gets transferred. It can take weeks or months to hire a new agent, train and assign them to a caseload and a further period of time before the new agent gets around to reviewing all the cases or inspecting them all to determine the status. Turnover is a serious problem in enforcement approaching 20% annually. This does not count staff leaving enforcement for other jobs within the County or DRP. The net effect is a lack of continuity and experience.

Perhaps the greatest shortcoming of CTRK is the inability of the system to truly manage the data. An effective case tracking system will sift through the open cases and, based on decision logic, provide guidance regarding which cases need urgent attention (e.g., those with overdue inspections or where deadlines for compliance have passed). CTRK can

perform these functions but not without significant user intervention and knowledge of the database and how it is organized.

Due to these limitations, CTRK is of limited utility as a case tracking system. Indeed, many enforcement agents only use the system sporadically, relying more on paper files or hard copies of CTRK reports to manage their inspections and activities. This also reduces the utility of CTRK as a management tool since much of the data tends to be out-of-date.

Enterprise-wide case tracking and permitting packages have been available for years and are used in many peer jurisdictions. DRP has taken a cautious approach on this, opting to evaluate these packages and their degree of consistency with DRP business processes. Thus far, the changes to DRP processes that would be required have been deemed to be too extensive to warrant the investment. Meanwhile, the Department of Public Works (DPW) has taken the lead and selected the KIVA package produced by Accela Corporation thereby setting the technology standard for DRP and the rest of the County.

### **Interagency Coordination**

As mentioned earlier, several County agencies are involved in code enforcement and inspections. Violations have a tendency to cross County organizational boundaries. Identifying and following up on violations across agency boundaries tends to be decentralized and uncoordinated. Each agency sends out inspectors, usually based on complaints received from constituents, to record and address violations of their specific ordinance. Zoning inspectors deal with zoning violations, Building and Safety deals with Building and Safety code violations and so on. This means that not only are many violations not addressed, but there is also much duplication of effort. Theoretically, three or four inspectors could write up the same property on three or four different visits and send three or four different notices of violation. In practice, the agencies do coordinate efforts to some extent but there is no system or process that assures that this happens.

CTRK is not integrated with similar systems used by other County agencies. The Building and Safety Division of the Department of Public Works uses a similar Access-based database system. Since many properties have violations that cross agency boundaries, theoretically, violations are logged and tracked on duplicate systems.

Each agency also has a different set of remedies and legal procedures built into their enabling ordinances making it difficult to consolidate violations and deal with them in a coordinated manner. The District Attorney is also reluctant to accept referrals unless violations are consolidated.

Another significant integration issue for the County deals with all discretionary permits, not just CUPs. With most discretionary permits come conditions of approval, mitigation measures or improvements that must be made to lessen the impacts of development. These conditions are imposed by several County agencies involved in development review: DRP, Public Works, Parks, Fire, and Environmental Health. Conditions are typically consolidated by DRP and then issued to applicants and developers.

Verification that conditions have been satisfied, through the inspection process, is the responsibility of each agency that imposed the conditions. In practice, there is virtually no assurance that all conditions imposed by all agencies for a specific project will be inspected. Some agencies have stronger inspection programs than others or more rigorous scheduling

and tracking systems. The decentralized nature of the inspection process means that there is little accountability over the process. It is too easy to assume that another agency is checking compliance.

Fragmentation in the process of conditioning development permits and ensuring compliance with those conditions through inspections has created serious breakdowns. During 2002, several conditions associated with a residential project near Pasadena called La Vina were not implemented as agreed by the developer. The County Auditor-Controller investigated this issue and found “deficiencies relating to the development approval and monitoring process, including a lack of departmental collaboration and coordination.” This example illustrates the risks of loose controls over the development review process. The La Vina report recommends several measures that mirror the ideas proposed in this Management Audit including the implementation of a Countywide case tracking system.

The system is so uncoordinated that cases have been documented where permits are granted on properties with outstanding code violations thereby rewarding violators for non-compliance. If the County is serious about code enforcement and enforcing conditions of approval, which it seems to be at a policy level, the underlying procedures and systems need to be upgraded to ensure that policy becomes practice on a consistent basis.

## **Recommendations**

### **Implement the KIVA system for case tracking**

The Board of Supervisors should provide supplementary funding and DRP should provide staff support to implement the same KIVA system that is currently being implemented by DPW including the code enforcement, current planning, inspection management functions as well as the web-based applications available from KIVA. The County should also encourage deployment of the KIVA system at other County agencies heavily involved in development review and code enforcement such as Environmental Health and Fire.

This system will support key planning processes, allow Regional Planning staff remote access to critical planning information, and provide better case management tools, such as identifying overdue inspections and code violations that cross agency boundaries. DRP and the County should consider enhancing the existing IT modernization surcharge to fund KIVA.

### **Establish a Special Remedies program for recalcitrant violators**

DRP should establish a cross-agency program for addressing violations that cannot be resolved within six months. The program should include these elements:

- A Memorandum of Understanding among DRP, Public Works, Environmental Health, Fire, County Counsel, Sheriff, District Attorney and the CAO,
- A mechanism for assembling cross-agency teams periodically to address the worst or most recalcitrant offenders,
- Assign these cases to a special unit comprised of former law enforcement personnel,
- Record violations and/or administrative judgments against property title to encourage compliance for less than critical violators,
- Implement a civil track using injunctions and restraining orders,
- Consider deputizing County Counsel staff to handle criminal cases and civil matters brought against certain violators, and

- Implement an assessment process for recalcitrant violators where representatives from the District Attorney, DRP and County Counsel review certain cases and select the best enforcement strategy.

### **Amend ordinances so that code violation procedures and compliance tools are consistent across agencies**

County Counsel, with assistance from DPW, DRP, Fire and Environmental Health should amend the zoning, building and safety, fire and public health ordinances so that the fines, penalties and enforcement procedures are consistent across agencies. Ordinances should also facilitate consolidation of violations and mitigation efforts.

## **Succession**

Staffing at the DRP was particularly hard hit during the County's financial difficulties in the early 1990s. Agency staffing was reduced from approximately 200 to fewer than 90. The agency did not hire in appreciable numbers again until the late 1990s. This legacy will have repercussions for years. DRP has been successful in recent years recruiting new planners and rebuilding the Department.

Given the high number of impending retirements in the near future, the agency needs to be in a position of building skills, tenure and knowledge at an aggressive rate. This is hindered by the high turnover rate, particularly among young planners in the Zoning Enforcement Sections. DRP does not collect exit interview data thereby missing an opportunity to systematically analyze and address turnover. Anecdotal information suggests that a key factor in some exits is the lack of challenging job content in zoning code enforcement. Related to this is the perceived lack of promotional opportunities in other areas of the agency. Many young planning hires perceive code enforcement as "paying their dues" before moving up into planning positions. Many exit prior to realizing these promotion opportunities. The agency should address job content and career path issues in this area as part of a strategy of reducing turnover, improving continuity in code enforcement and expanding the pool of experienced planners.

Of the 23 managers and Section heads in DRP, 15 or 65% have at least 25 years of County experience. These tenure statistics point out a serious risk area for DRP. The agency will suffer a severe loss of managerial and institutional knowledge in the next few years.

## **Recommendations**

### **Enhance career path for new DRP hires**

DRP should enhance the job content and career path for new DRP hires by implementing several policies:

- Enforce a strict policy of rotating new hires among zoning enforcement, advance planning and current planning jobs during the first 18 months of their employment.
- New hires should be assigned a mentor who can expose them to other areas of the office, monitor their rotation schedule, advocate for them and ensure that they are on a track to accumulate experience and knowledge about planning.
- Monitor progress against the Strategic Workforce Plan.
- Manage the progress and career track of each new hire by hiring a true human resources professional to augment the current HR bookkeeping staff.

**Develop a succession plan**

The succession plan should be directed at replacing the mid- and high-level managers that may be retiring from DRP in the next few years. The plan should include the following strategies:

- A search strategy for going outside the County,
- A search strategy for looking within other County agencies for possible replacements,
- A plan for hiring current managers back on contract, and
- An aggressive program for training, mentoring and developing the current staff, especially those in code enforcement, for positions in current and advance planning.

## Records Management

Case files are stored in open accordion-style file wallets. Once a case is completed, the papers are usually stored in the accordion wallets and then stored in one of three locations on either the 13<sup>th</sup> or 10<sup>th</sup> floor of the Hall of Records off site or at a private record storage company in Commerce. The three locations in the Hall of Records are used to store case files that have been active within the previous six months. The three locations are open to anyone including passersby. The locations are also, as is any location in the Hall of Records, not sprinklered. This exposes the files to theft, misplacement or fire damage.

House numbering maps (or HNMs) are large paper maps that show parcel boundaries, parcel numbers, zoning, street addresses, and the case history on parcels such as current or prior CUPs or plot plans. DRP maintains a complete set of HNMs on the 13<sup>th</sup> floor in an unsprinklered room. HNMs receive heavy use. They currently constitute the authoritative record of parcel boundaries and case history in the County. They are used to research parcel history, identify parcel numbers, identify zoning, etc.

HNMs are not backed up in either paper or digital form. Until recently the information from the HNMs was stored on the agency's CAD system but as this system is no longer being maintained, the HNMs stand alone without a reliable backup. Should the maps become lost through some disaster such as a fire, they would be extremely difficult and time consuming to replace (i.e., the County would have to recreate the information from case files assuming those were not also destroyed in the same disaster.)<sup>6</sup> DRP management is aware of the risks involved but has not acted quickly to secure the necessary equipment and staff support to generate digital copies of the maps. The Business Automation Plan includes a document management system among its proposed IT enhancements that would include backing up case files and maps but the critical nature of these documents makes it imperative that the agency act quickly.

## Recommendations

**Produce fiche or digital copies of the more critical case files**

The DRP should produce fiche copies of the most critical case files in the archives. These would include contentious projects, projects with a long build-out program that will be revisited in the future, or projects subject to ongoing inspection. DRP should also consider imaging case files if that proves more economical than fiche.

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<sup>6</sup> The agency could also use RPC minutes to reconstruct maps but these do not cover all cases. Permits handled ministerially would not be included in RPC minutes for example.

**Produce a digital backup of the HNMs using a scanner**

DRP should immediately make arrangements and dedicate resources to digitizing the HNMs to protect against catastrophic loss due to fire. HNMs themselves should be phased out and archived as the GIS is completed over the next two to three years.

## Information Technology

Besides the case tracking system discussed earlier, DRP also maintains a Computer-Assisted Drafting (CAD) system for keeping track of parcel boundaries, case history and zoning designations. As is the case with CTRK, the DRP staffperson who supported CAD has retired and is now only working part-time producing maps for RPC meetings. CAD itself has not been updated with new case or parcel data for months.

Through the initiative of DRP's IT staff, the Department has been successful in obtaining funding from the County CIO for converting the Department's CAD-based maps to GIS, a project called the "Zoning Map Conversion and Integration Project." The project is a partnership between DRP and DPW, with DRP providing project management and staffing and DPW providing staff and financial support.

As of the time of this analysis, no action had been authorized by DRP management to begin the process of hiring the necessary staff to begin digitizing maps. Thus the project is at least three months behind schedule already. As a result the County will be facing a two- to three-year period during which zoning changes will only be updated manually before GIS is rolled out.

## Recommendations

**Expedite the implementation of the Zoning Map Conversion Project**

The DRP should take immediate steps to accelerate the Zoning Map Conversion and Integration Project. DRP may want to consider hiring planning student interns to systematically inventory the existing maps and enter the key data (e.g., parcel number, zoning, case history) into the GIS.

## II. INTRODUCTION

### Description of the Department of Regional Planning

The Los Angeles County Regional Planning Commission was created in 1922 by County Ordinance. The Commission was charged with studying and planning the physical development of unincorporated areas and making recommendations to the Board of Supervisors regarding development. In 1929 the State Planning Act authorized the creation of Regional Planning Districts for coordinating planning activity within Counties and providing staff support for the Planning Commission. The Los Angeles County Planning District was created in 1939 for this purpose with oversight from the Commission. The Planning District became the Department of Regional Planning in 1974.

The Department of Regional Planning or DRP:

- Establishes and maintains a continuing comprehensive long-range process for the physical, social and economic development of the County,
- Prepares and maintains area and community plans,
- Administers the County's subdivision and zoning ordinances through reviewing development and permit applications for consistency with the ordinances,
- Develops and maintains a base of information on land use and development conditions within the County,
- Responds to zoning violations, and
- Develops programs to encourage the realization of the County General Plan.

The mission of the DRP is:

"To improve the quality of life through innovative and resourceful physical and environmental planning, balancing individual rights and community needs."

The agency also has a motto:

"Planning for the challenges ahead."

DRP recently undertook a strategic planning process. Key strategies incorporated in the strategic plan include:

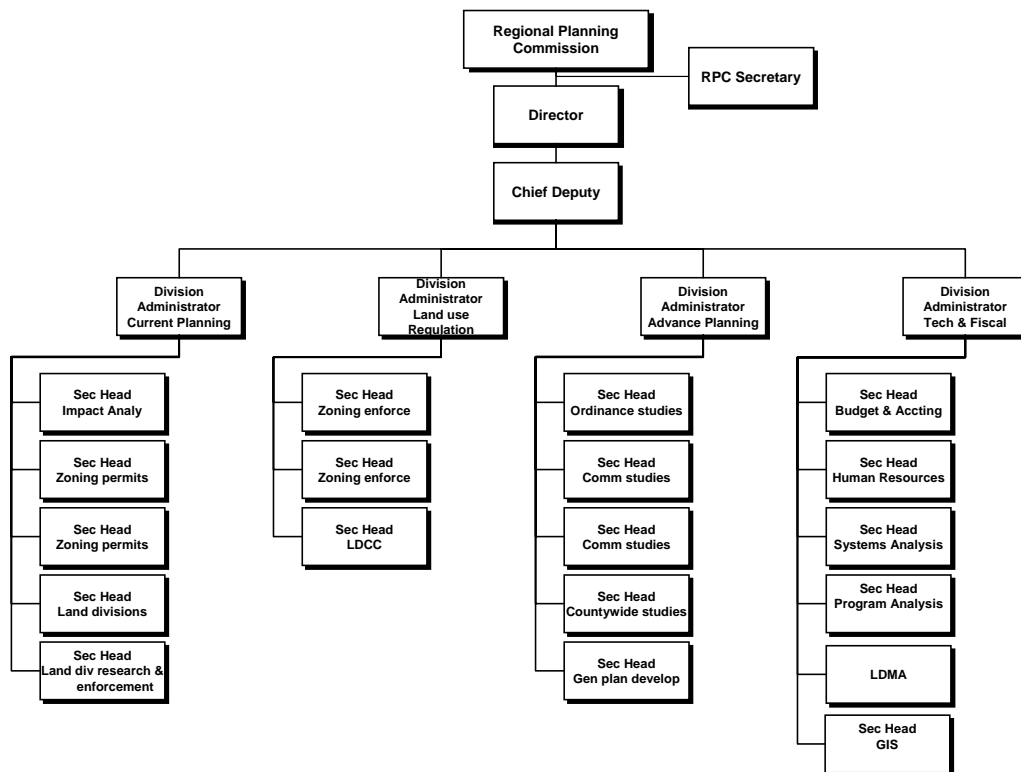
- A customer service program,
- Internal partnerships for organizational effectiveness,
- Internet services,
- Community outreach,

- Joint area planning,
- Revenue enhancement,
- Succession plan, and
- Intranet services.

## DRP Organization

DRP is organized according to function. The three core programs: advance planning, current planning and land use regulation, are each represented by a division Administrator. A fourth Division oversees administrative functions. The organization is also centralized with most functions and staff reporting through managers that have Countywide responsibilities. Land Use Regulation Division managers and staff split the County into two groups of supervisorial districts so they have some semblance of organizing along geographic lines. The organization is structured as follows:

**Figure 1 - Current Organizational Structure**



DRP staff are based out of the Hall of Records in downtown Los Angeles. DRP staff also work at public counters in nine field offices administered by the Department of Public Works on an itinerant basis.

## Staffing

Regional Planning is predominately a professional department. Of the 125 budgeted positions, two-thirds (66%) are planner classifications requiring a bachelor's degree as a minimum qualification. Positions are also distinguished by the long learning curve

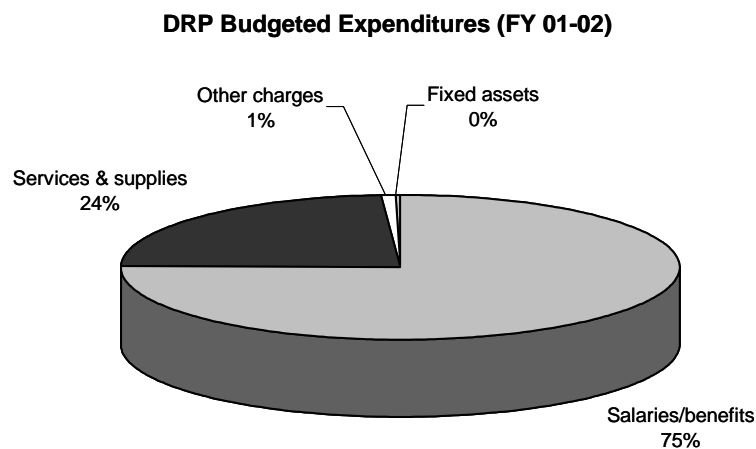
associated with planning. It can take years to develop the necessary skills to prepare complicated advance planning documents, conduct community outreach or support the Planning Commission.

Staffing at the DRP was particularly hard hit during the County's financial difficulties in the early 1990s. Agency staffing was reduced from approximately 200 to fewer than 90. The agency did not hire in appreciable numbers until the late 1990s.

## Financing

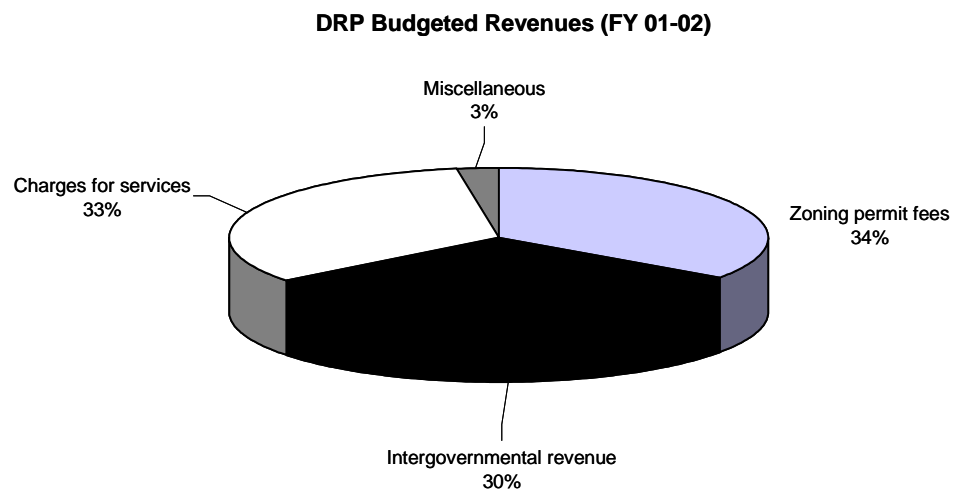
The DRP has a budget of approximately \$13 million. The following pie chart shows the breakdown of this amount:

**Figure 2: DRP Expenditures**



Of total budgeted expenditures from FY 01-02, \$7.8 million or 61% is covered by the County General Fund. The remaining \$5.2 million is recovered through revenues<sup>7</sup>. The following pie chart shows a breakdown of these revenue sources:

**Figure 3: DRP Revenue Sources**



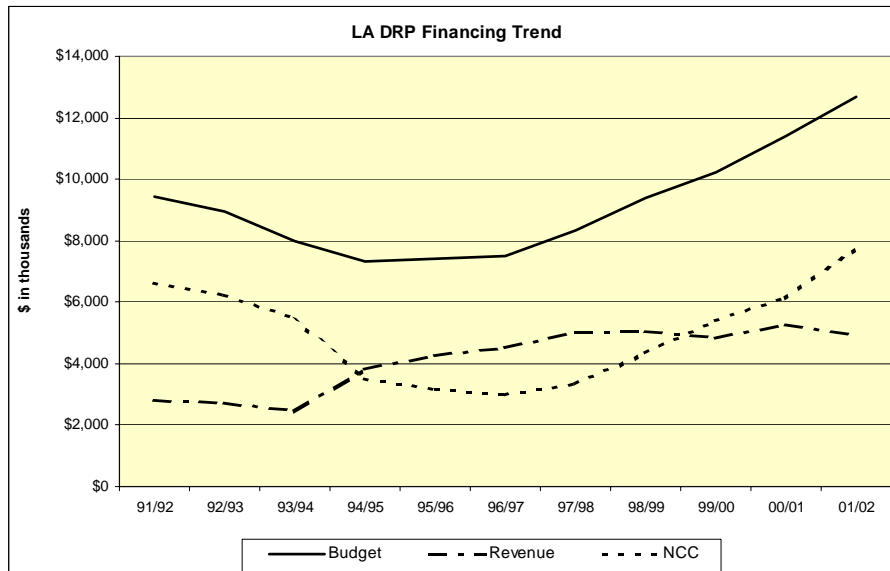
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<sup>7</sup> Intergovernmental revenue primarily consists of Community Development Block Grant funding that pays for focused zoning code enforcement activities. Additional intergovernmental revenue comes from the Department of Public Works.

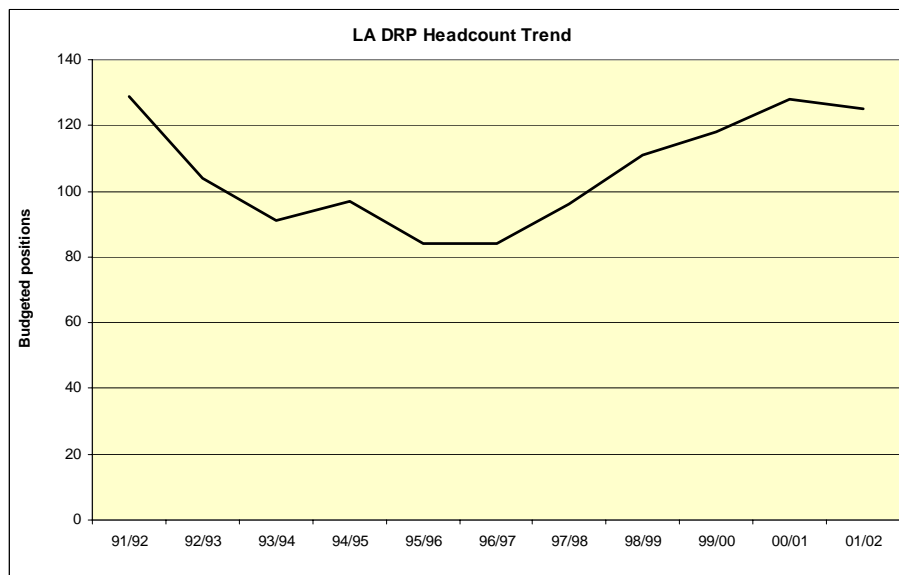
Fee levels are generally set by County Ordinance. The DRP periodically assesses the cost recovery level from various programs to determine whether fee levels are adequately set.

Figure 4 shows the trend in Department budget allocation, net county cost and revenues over the past eleven fiscal years. Figure 5 shows the trend in budgeted headcount over the same period:

**Figure 4: Financing Trends**



**Figure 5: Headcount Trends**



As seen in Figures 4 and 5, DRP experienced a significant drop in budget and NCC during the mid-1990s coinciding with a severe local recession that hit real estate and development activity fairly hard. Revenue was more stable and even increased due to various fee increases. Headcount also showed a pronounced drop in the mid-1990s, a development that has fostered a range of human resource issues that are coming to bear now.

Since FY 96/97, budget and NCC has grown significantly allowing the agency to be more aggressive in hiring and taking on some deferred projects. As discussed in the following pages, while headcount is recovering, there are a range of projects that have either been deferred or not attempted due to organizational inertia.

## Services

The three major services provided to customers are:

1. **Advance Planning** is concerned with guiding development and growth in the County, revitalizing communities and improving the quality of life for County residents. The Advance Planning Division uses tools such as the Countywide General Plan, Community and Area plans and various ordinances to implement their mission.
2. **Current Planning** involves processing entitlement applications including a variety of discretionary permits, land division applications, lot line adjustments, certificates of compliance, privately initiated zone reclassifications and plan amendments and the related environmental review.
3. **Land Use Regulation** responds to violations of the zoning ordinance. This is accomplished through an intensive program of inspection and follow-up, logging violations and, occasionally, criminal prosecution.

In addition, these services are supported by the Technical and Fiscal Services Division that provides HR, IT and finance functions.

## Accomplishments

In addition to the day-to-day accomplishments of preparing ordinances, reviewing development applications, and investigating zoning violations, DRP has also implemented a number of significant improvements over the past five years:

- Prepared or initiated several key planning products including the Santa Monica Mountains North Area Plan, housing and safety elements of the Countywide General Plan, Community Standard Districts in several areas in the County, and Transit Oriented Districts,
- Completed the WEBTRACK system allowing internet access to case information,
- Initiated joint area planning arrangements with adjacent cities, and
- Implemented a Countywide GIS including aerial photos.

## Project Objectives

This audit was commissioned by the Board of Supervisors in the interest of ensuring the efficient and effective operation of County government. The objective of the project is to:

“. . . evaluate [the] mission, operations, policies, procedures and programs to provide the basis for recommendations for improving the effectiveness and efficiency of program operations and service delivery.”

Three areas in particular were identified as being of real interest:

1. Addressing processing backlogs for current planning cases,
2. Constructing a streamlined system of performance measurement, and
3. Retention of technical staff and mitigating the impact of pending retirements.

## Project Scope

The scope of the project included the entire operation of the DRP with the following exceptions:

- Accounting and financial areas such as cash management, trust fund accounting, accounts receivable controls, overtime use and procurement practices. These areas are the subjects of a prior Fiscal Management Review conducted by the Los Angeles Auditor-Controller.

Though the time frame of the audit was not limited, for the purposes of the consultant's work, operational and financial data was generally obtained and used from approximately 1997 forward. Most of the findings relate to current conditions as of July 31, 2002.

## Standards Used

The consultants conducted this management audit in accordance with general and performance audit standards regarding qualifications, independence, due professional care, quality control, fieldwork, and reporting prescribed by the U.S. General Accounting Office (GAO) in Government Auditing Standards (1994 Revision).

## Methods Used

The management audit was conducted in three phases:

**Phase A – Preliminary Survey.** In the preliminary survey phase, the consultants held an entrance conference; gathered information about the DRP program operations; developed a

profile of the DRP; prepared a risk assessment; and developed a detailed work plan for the subsequent fieldwork phase of the project.

An essential part of the preliminary survey was obtaining the views of key internal and external stakeholders. The consultants conducted 40 interviews of County staff, DRP staff and outside observers and stakeholders. These stakeholders included representatives from:

- Large development companies and their contract engineers and planners,
- Environmental groups,
- Community groups,
- Adjacent cities,
- County agencies, and
- The Regional Planning Commissioners.

The consultants also conducted a review of pending legislation and litigation that may impact the operations or financial integrity of the DRP.

**Phase B – Fieldwork.** In the fieldwork phase, the consultants performed the tasks incorporated in the Phase B workplan. These included:

- Review of staffing projections and succession issues,
- Observations of customer interfaces including public counters,
- Process mapping of current planning, permit inspection and zoning enforcement functions,
- Focus group with representative planners and engineers,
- Review of website features,
- Analysis of turnover and retention data,
- Observation of Regional Planning Commission operations,
- Analysis of current and planned IT systems,
- Analysis of advance planning issues,
- Field observations of zoning enforcement functions,
- Observations of current planning functions including client counseling sessions and subdivision review committee meetings,
- Analysis of caseloads and backlogs,
- Accumulation and analysis of statistical data on zoning enforcement caseload and productivity,
- Analysis of current performance measures and development of alternative measures, and
- Analysis of record management practices.

At the conclusion of Phase B, the consultants presented preliminary findings and recommendations to the Auditor-Controller project managers as well as DRP executive management.

**Phase C – Reporting Phase.** In this phase, the consultants prepared a draft final report, conducted an exit conference with DRP and Auditor-Controller staff and finalized the report.

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# III. FINDINGS AND RECOMMENDATIONS

## Section A – Strategic Planning

Regional Planning finalized a strategic plan in January of 2002. The planning process was started during February 2001. The planning process included several steps:

1. Environmental scan of internal and external trends, challenges, issues and opportunities,
2. Development of a Department vision and mission statement,
3. Development of strategic models,
4. Convening five agency work groups to analyze data and identify strategy elements,
5. Categorizing strategy elements using five strategic planning models:
  - Partnership models, where common interests and joint ventures are identified,
  - Organizational models,
  - Facility models,
  - Business models, including revenue generating options, and
  - Service delivery and access models.
6. Evaluating strategy elements using various limiting assumptions, and
7. Development of action plans.

The strategic plan resulted in seven separate action plans, each one covering a major theme. These themes are:

- A. Customer service,
- B. Organizational effectiveness,
- C. Internet services,
- D. Community outreach,
- E. Joint area planning,
- F. Revenue enhancement, and
- G. Intranet services.

Each action plan included several action items that are roughly analogous to the recommendations in this Management Audit. Figure 6 on the next two pages shows how these action plan items and recommendations compare and match up. The table lists each key management audit recommendation and then any corresponding Strategic Plan action item. If no action item is listed next to a management audit recommendation, then the strategic plan does not cover it.

**Figure 6 – Strategic Plan – Management Audit Cross-Reference**

Key Management Audit Recommendations		Analogous Strategic Plan Action Item		Comment
#	Description	#	Description	
B-1	Move the LDCC and field office staffing to Current Planning Division			
B-3	Open the LDCC on a 5/40 schedule			
B-5	Deploy DRP staff to field offices	A.3 B.15	Full service one-stop counter, benchmark study of DRP's org structure.	Strategic plan does not specify whether one-stop counter is one location or several locations. Mgmt Audit recommends five full-service one-stop offices. Mgmt audit also goes a step further in suggesting an org structure alternative incorporating objecti
C-2	Expedite RPC proceedings			
D-1	Complete the General Plan update			
D-2	Update existing community/area plans and creating new community/area plans	D.1-10	Partnership model; Expand community outreach	Items are similar.
D-3	Revise the County Zoning Ordinance			
E-3	Consider instituting a small plan check fee	F.3	Cost recovery plan	
E-5	Retain consultants/agency retirees for peak loads			
E-6	Project manager approach to project review should be implemented			
E-7	Change role of Impact Analysis to provide support for case planners			
E-8	Zoning Permits sections should perform preliminary environmental reviews			
E-9	Complete initial project reviews within 30 days	A.3	Review departmental processes	Objectives are similar. Mgmt. audit is more specific.
E-11	Expedite County agency review	A.3	Review departmental processes	Objectives are similar. Mgmt. audit is more specific.
E-17	Recruit and fill the vacant positions in the Zoning Permits sections			
E-18	Improve cost recovery of zoning permits	F.3	Cost recovery plan	
E-19	Expedite zoning permit process	A.3	Review departmental processes	Objectives are similar. Mgmt. audit is more specific.
E-20	Convert some use permits to minor permits			
E-21	Use contract title investigators for processing new certificates			
E-22	Limit requirements for certificates of compliance			
E-23	Develop a policy/procedure handbook	A.3	Review departmental processes	Objectives are similar. Mgmt. audit is more specific.
E-25	Improve documentation of conditions			
F-1	Implement productivity enhancing tools and practices in enforcement			
F-2	Improve collection efforts for non-compliance fees	F.3	Cost recovery plan-non compliance fees	
F-3	Establish a special remedies program for recalcitrant violators			
F-4	Create a special unit to handle long-term cases			
F-5	Inspect all overdue CUPs			
F-6	Address older CUPs			
F-7,J-4	Implement the KIVA system for case tracking			
F-8	Make code violation procedures and compliance tools consistent across agencies			
F-9	Implement steps to strengthen condition compliance			

**Figure 6 – Strategic Plan – Management Audit Cross-Reference (continued)**

Key Management Audit Recommendations		Analogous Strategic Plan Action Item		Comment
#	Description	#	Description	
G-1	Implement the performance measures identified during the June 25 workshop			
H-1	Enhance career path for new DRP hires			
H-3	Fill vacant planning positions			
H-4	Develop a succession plan	B.9-13	Leadership, team building, training needs assessment, mentor program, etc.	Good action items in strategic plan. Mgmt Audit includes some of the same ideas but has a very specific focus on succession and replacement of retiring managers and specialists.
H-6	Enhance new-hire training	B.9-13	Leadership, team building, training needs assessment, mentor program, etc.	Same as H-5
H-7	Roll out the Staff Skills Matrix			
H-8	Hire a true HR professional			
I-1	Produce fiche copies of the more critical case files	C.7-10	Document mgmt system	Similar objectives.
I-2	Hire file clerk; develop computerized case file log	C.7-10	Document mgmt system	Similar objectives.
I-5	Produce a digital backup of the HNMs using a scanner			
J-1	Update the Business Automation Plan			
J-2	Fill vacant IT positions			
J-3	Expedite the implementation of the Zoning Map Conversion Project			
J-5	Increase the existing IT surcharge			
K-1	Develop and implement a policy regarding ex-parte communication			

In addition, to the Strategic Plan action items referenced in Figure 6, there are other action plan items that are not included as recommendations in this Management Audit. These action plan items are listed in Figure 7 below.

**Figure 7 – Additional Strategic Plan Action Plan Items**

Strategic Plan Action Item #	Description	Comment
A.3	Enhance walk-in customer service	Action item provides specific improvements to public counters such as better signage, public photocopier. Comparable Mgmt audit recommendation favors decentralizing most public service to field offices; defers to DRP mgmt on details of counter design. Action item is appropriate as long as it pertains to field offices and not the Hall of Records counter.
A.3	Improve phone service	Good action items for improving phone service.
B.8	Improve intra-departmental communications	Good action items for improving Department communications.
C.1-6	Enhance DRP website	Mgmt audit suggests implementing web functions of KIVA land mgmt system first. Additional features can be added later.
C.7-10	Document mgmt system	Mgmt audit suggests implementing applicable features of KIVA system.
C.11-13	Electronic permitting system	Mgmt audit suggests implementing applicable features of KIVA system.
D.1-10	Partnership model; Expand community outreach	Mgmt audit team was impressed with current efforts at community planning.
E.1-14	Joint area planning in Santa Clarita/Antelope Valley	Joint area planning is underway.
F.3	Cost recovery plan	Action item includes additional cost recovery ideas beyond what mgmt audit discusses. All should be addressed.
F.4	Obtain grants	Good idea.
F.5	Review fee schedule	Good idea. Mgmt audit team received indications that CUP fees may not be recovering costs and included a recommendation. Mgmt. audit also includes recommendations on instituting a small plan check fee.
F.6	Study market value of DRP data	Good idea. GIS will produce marketable data once fully implemented.
F.8	Market DRP services to cities	Good idea but likely very difficult to implement. Local control sentiments can be strong disincentive to outsourcing planning functions. Would also require a good accounting system to ensure that all costs, including overhead, are being recovered.
G.1-10	Implement Department intranet	Good idea. Should be implemented.

## Recommendations

### Recommendation A-1: Update Strategic Plan

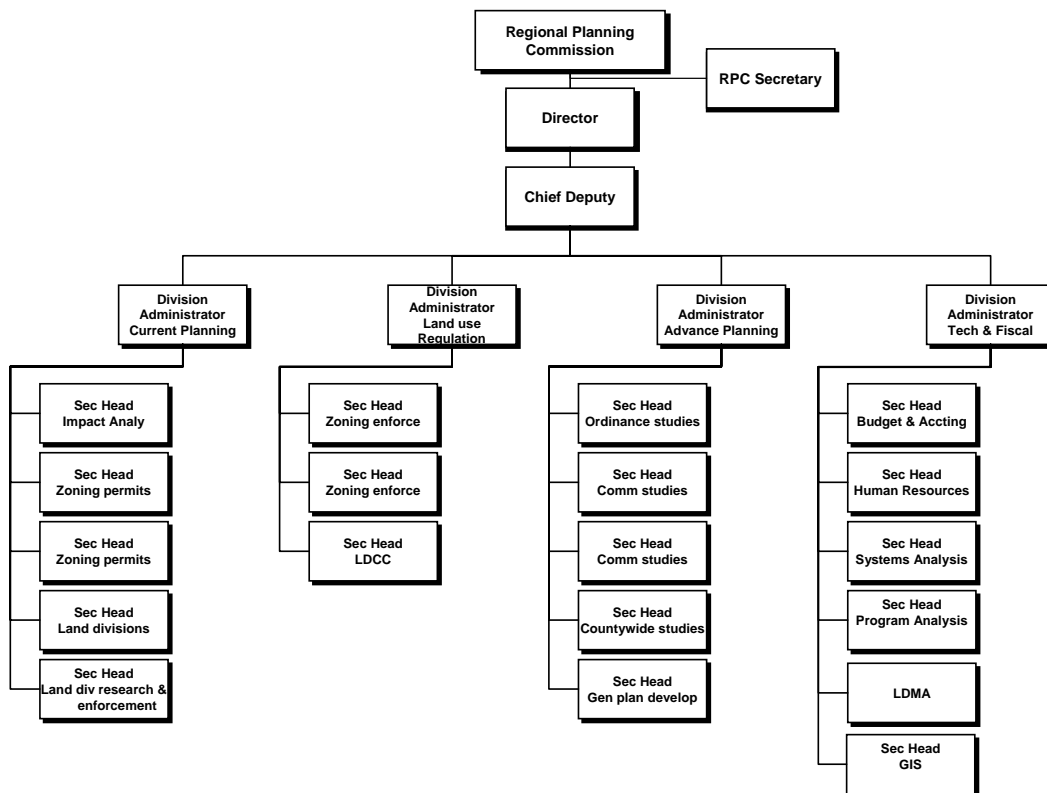
DRP should update their current strategic plan to include key recommendations from the Management Audit such as:

- Deploying DRP services to field offices,
- Completing the General Plan update
- Revising the Zoning Ordinance,
- Implementing a project manager approach for current planning cases,
- Converting certain CUPs to minor permits,
- Case planners performing impact analysis for simpler cases,
- Restructure the zoning enforcement process to include additional enforcement mechanisms,
- Revise code enforcement tools and procedures among County agencies to be consistent across agencies,
- Implement the performance measures,
- Develop a succession plan,
- Implement KIVA,
- Expedite the zoning map conversion project, and
- Expand the scope of the IT surcharge.

## Section B – Organizing for Improved Customer Service

DRP is organized according to function. The three core programs, advance planning, current planning and land use regulation, are each represented by a division administrator. A fourth division oversees administrative functions. The following chart illustrates the agency's structure:

**Figure 8 – Current DRP Organizational Structure**



The organization is also centralized with most functions and staff reporting through managers that have Countywide responsibilities. Land Use Regulation managers and staff split the County into two groups of supervisorial districts so they have some semblance of organizing along geographic lines.

The Land Development Coordinating Center or LDCC (i.e., the public counter function) reports through Land Use Regulation Division, yet its function is more aligned with Current Planning since they are the first point of contact for applicants. The remainder of the Land

Use Regulation Division is concerned with zoning code enforcement rather than handling applications or handling inquiries.

**Recommendation B-1: Move the LDCC (i.e., public counter function) and field office staffing to Current Planning Division**

DRP should move the LDCC and the field office functions from the Land Use Regulation Division to the Current Planning Division. This will consolidate all functions involved with handling development and zoning inquiries and application submittal and review into one organizational unit.

## Telephone Service

Customers that call DRP requesting information are handled during the morning shifts by the Hall of Records public counter staff (while the doors are locked) from 7:30 a.m. to 11:30 a.m., Monday through Thursday. Callers are greeted by an Automatic Call Distributor (ACD), similar to systems used by other agencies and companies everywhere. The ACD offers the following choices:

- Talk to a planner,
- Set up an appointment to discuss a project or request a one-stop meeting, and
- Check the status of a plot plan or a certificate of compliance.

Other basic information such as office location, hours, where to park, etc., are not provided. Based on our examination of call statistics kept by the ACD for the months of April and May 2002, we found:

- 51% of calls were abandoned, and
- 49% of calls were either answered or transferred.

Calls are abandoned for several reasons including a desired option is not provided, waiting too long to talk to a planner, etc. Our attempts to call DRP using the same publicly available phone numbers met with mixed success. Many attempts were met with either a dead phone line or a busy signal. Clearly, the existing ACD is not configured to handle the call volume.

**Recommendation B-2: Expand options and increase capacity of ACD**

Additional options should be included in the phone system and ACD such as office location including field office locations once they are staffed full-time, where to park, office hours, etc. In addition, the ACD should be expanded to allow for more incoming calls.

## Access to Information

A key factor impacting the level of customer service is that little information is available from automated systems to assist in helping customers. Many customers require approvals for home improvements or room additions or they are researching the zoning restrictions on property. In either case, DRP staff need to confirm the zoning designation and the development restrictions that apply. DRP staff typically rely on the house numbering maps (HNMs) and *Thomas Brothers* map books for this information. House numbering maps are frequently missing notations regarding permits and do not have the boundaries marked for other key planning districts such as Community Standard Districts. This makes it difficult to accurately research a parcel relying on the maps.

The Department does have a Geographic Information System (GIS), but the system lacks key data such as zoning designations and case history is not currently on the system. Section J has additional information and recommendations pertaining to GIS and providing better information to the public counters.

## Public counters

DRP staffs ten public counters. The majority of their business is handled at the counter in the Hall of Records on the 13<sup>th</sup> floor. This counter is staffed from 1:00 to 6:00 p.m. Monday through Thursday. The mornings are devoted to fielding telephone calls. The entire Department is on a 4/40 schedule (i.e., working 40 hours during Monday through Thursday) so they are not open on Fridays.

In addition to the downtown counter, DRP staffs public counters at nine field offices run by the Department of Public Works (DPW). These field offices are typically staffed one morning or afternoon a week. The table on the following page illustrates public counter staffing as a portion of working hours.

**Figure 9 – Public Counter Staffing**

Office	a.m./p.m.	Mon	Tue	Wed	Thu	Fri
Hall of Records	a.m.					
	p.m.	Staffed	Staffed	Staffed	Staffed	
Lancaster	a.m.	Staffed				
	p.m.					
Lomita	a.m.	Staffed				
	p.m.					
Santa Clarita	a.m.					
	p.m.	Staffed				
South Whittier	a.m.		Staffed			
	p.m.					
La Puente	a.m.					
	p.m.		Staffed			
Calabasas	a.m.			Staffed		
	p.m.			Staffed		
Arcadia	a.m.					
	p.m.			Staffed		
Florence/Firestone	a.m.				Staffed	
	p.m.					
East Los Angeles	a.m.					
	p.m.				Staffed	

As seen in the table, the majority of the counters are left unstaffed by DRP. Out of 100 potential working shifts among the ten offices (i.e., ten offices x five working days x two shifts per day), only 14 shifts are staffed or 14% of the total. Among the nine field offices, 32 hours of staff time are spread around during the week.

At one time, field offices were staffed on a more consistent basis. However, due to staffing cuts in the 1990s and the increasing emphasis on zoning enforcement, staffing levels in the field offices have not recovered and do not meet the current level of demand. Budget requests and other Departmental planning documents (e.g., strategic plans) in the last couple of years have included plans for increasing field office staffing. DRP has also been in discussions with the County Chief Administrative Office (CAO) regarding augmenting increased staffing as part of a broader Countywide economic development strategy. Thus far, these plans have not been realized.

This intermittent staffing pattern has several consequences:

- Out in the field, customers and members of the public must be aware that staffing is intermittent and know which day they need to arrive. During those days, some field offices team with people requesting service or to have their plans reviewed for zoning consistency.
- Customers and members of the public that come to the Hall of Records frequently arrive in the morning and must either return later or wait until the doors are open. On most days, one or two customers can be found waiting in the 13<sup>th</sup> floor lobby for the doors to open. This can be frustrating for the customers as they can plainly see

that DRP staff are working as they circulate around the floor and even behind the counter (behind the locked doors).

- When customers go to field offices during days when DRP staff are not present they rely on DPW staff to answer their questions. Frequently, these questions pertain to zoning issues (e.g., setbacks, building height). DPW field office staff are primarily concerned with building and structural issues and are not trained to answer zoning questions. In the past DPW staff would attempt to answer the simpler zoning questions but this practice has been curtailed due to the increasing complexity of the Zoning Ordinance, particularly those sections dealing with Community Standard Districts. DPW staff are uncomfortable answering these questions and more and more frequently send customers downtown to consult with DRP staff at the Hall of Records. Many customers require a zoning clearance on a simple plot plan (e.g., room addition or new patio), a transaction that could be handled quite expeditiously by DRP field office staff if they were present.

### **Recommendation B-3: Open the LDCC on a 5/40 schedule**

Within six months, DRP should expand the business hours of the LDCC, public counters, and appropriate support functions to a 5/40 schedule (i.e., open five days and 40 hours over a weekly period). This would include handling phone calls and opening the counter for a full business day rather than splitting the day as is currently done. To accomplish this, DRP staff could be converted to a 5/40 schedule or shifts could be staggered to provide 5/40 staffing while allowing staff to work 4/40 schedules.

Compounding the limited hours and image of the DRP office in the Hall of Records is the distance that customers must drive. Of all the unincorporated areas in the County, only East Los Angeles is within five miles of the Hall of Records. See Appendix 4 for a map showing the location of unincorporated areas. Most of the unincorporated areas and the customers that work or reside there are located long distances from downtown Los Angeles. Parking is also limited and expensive near the Hall of Records. Most nearby lots charge at least \$14 per day for parking.

Waiting times can vary significantly at the public counter. At times, the wait can be an hour or longer. Other times there is no wait at all. DRP does not have a system for tracking wait times. On-site observations reflected the wide variation in wait times.

Despite these logistical difficulties, we observed that DRP staff provide excellent service at the public counters. The majority of customer transactions that we observed at the counters were handled promptly (once the customer's turn for service came) and in a courteous manner. We were particularly impressed by the field office staff: supplied with little more than their gray Zoning Ordinance binders and the out-of-date house numbering maps in the field offices, the staff gave excellent service. DRP does stock a supply of comment cards in the waiting area. An examination of three months of responses were generally positive about the customer service.

**Recommendation B-5: Deploy DRP staff to field offices**

DRP should develop a strategy for deploying staff, functions and services to the field closer to the unincorporated areas and the agency's customer base. Field office deployment will have several benefits:

- Zoning code enforcement staff will be much closer to the areas they are working in, thereby eliminating frequent trips to downtown Los Angeles to handle paperwork.
- DRP staff will develop specific expertise and knowledge of land use issues, community concerns and enforcement trends in a specific area of the County rather than having to develop this expertise for the entire County. They will also become familiar with Community Standard Districts (CSDs) and other planning areas in their area. This will facilitate more responsive service for County residents and more effective responses to local land use issues.
- County residents can reliably expect to be served at a local DRP office without having to schedule around when a DRP representative will be in the area or having to travel to downtown Los Angeles. County residents will also deal with DRP staff that are familiar with their area and the relevant land use standards that apply in their area.
- Current Planning staff will be able to more readily visit the sites that pertain to the permits, subdivisions or applications that they deal with rather than rely on aerial photos or second hand information.
- Advance Planning staff will have a local office to work with when gathering local information or obtaining community input for advance planning products such as Community Plans.
- Current Planning and counter staff will be able to work directly with DPW staff to provide true "one-stop"<sup>8</sup> service. This is a key benefit as a large number of customers are typically planning home improvements or room additions and can get clearances from DRP (for zoning consistency) and DPW (for structural plans) during one visit. This "one-stop" service occurs now when DRP staff are present in a DPW field office. Field office deployment would provide "one-stop" service on a permanent and ongoing basis.

We suggest an eight-step process for field office deployment:

1. Select no more than five Building and Safety field offices to establish a DRP presence. Any more than five offices will dilute the available DRP staff among too many offices and make it difficult to provide good service. Identify the geographic areas handled by those offices. Offices should be assigned specific geographic areas corresponding to a cluster of unincorporated areas

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<sup>8</sup> In this context we define one-stop service as consolidating the DRP and DPW counters in one location so that applicants can receive services (e.g., plan check and zoning consistency check) in one location. DRP uses the term one-stop to mean a meeting of agency staff and applicants to review proposed projects and identify potential issues.

rather than Supervisorial District boundaries. Applicants and customers would have to work with the office assigned to the location of their application or violation. Suggested clusters would include:

- La Puente office serving Hacienda Heights, Rowland Heights, unincorporated islands in the San Gabriel Valley, South Whittier and serving parts of Supervisorial Districts 1, 4 and 5,
  - Florence-Firestone office serving unincorporated areas in south central Los Angeles, the harbor area and south bay and serving parts of Supervisorial Districts 2, 3 and 4,
  - Calabasas office serving unincorporated areas along the Ventura Freeway corridor and serving parts of Supervisorial District 3,
  - An East Los Angeles office serving East Los Angeles, Altadena and parts of Supervisorial District 1 and 5, and
  - A Santa Clarita office serving the Santa Clarita area, the Highway 14 corridor and the Antelope Valley and parts of Supervisorial District 5.
2. Of these five offices, one should be selected as a pilot site to experiment with the deployment and prove and/or fine-tune the concept.
  3. Move zoning code enforcement agents out to the field offices. Assign them to handle code enforcement tasks in the areas served by the field offices. Provide reliable network connections to the CTRK case tracking system allowing the staff to monitor their cases from the field offices. Transition to the KIVA<sup>9</sup> system as it goes into full production and replaces CTRK.
  4. Transition current code enforcement staff to public counter and current planning tasks in the field offices with the objective of backfilling planning positions as planners are promoted or as they replace retiring managers.
  5. Implement KIVA website features (see Section J for more details).
  6. Bring GIS up with all zoning designations, current permits and parcel history. Connect field offices to GIS.
  7. Move other Hall of Records staff to field offices:
    - Portions of the Current Planning staff would be assigned to the field offices. Permitting staff (handling use permits) could be assigned to field offices. DRP should also explore the feasibility of assigning the subdivision staff to the Santa Clarita (or an office in the north area) since most of their workload is in that area, although a continued presence downtown may be preferable to be accessible to other County agencies and the RPC.
    - The Regional Planning Commission would continue to meet downtown. DRP staff stationed in field offices would travel downtown on RPC meeting days.
    - Community Planning staff should be stationed in the field offices. Portions of the Advance Planning Division dealing with Countywide planning should remain downtown in the Hall of Records as their scope

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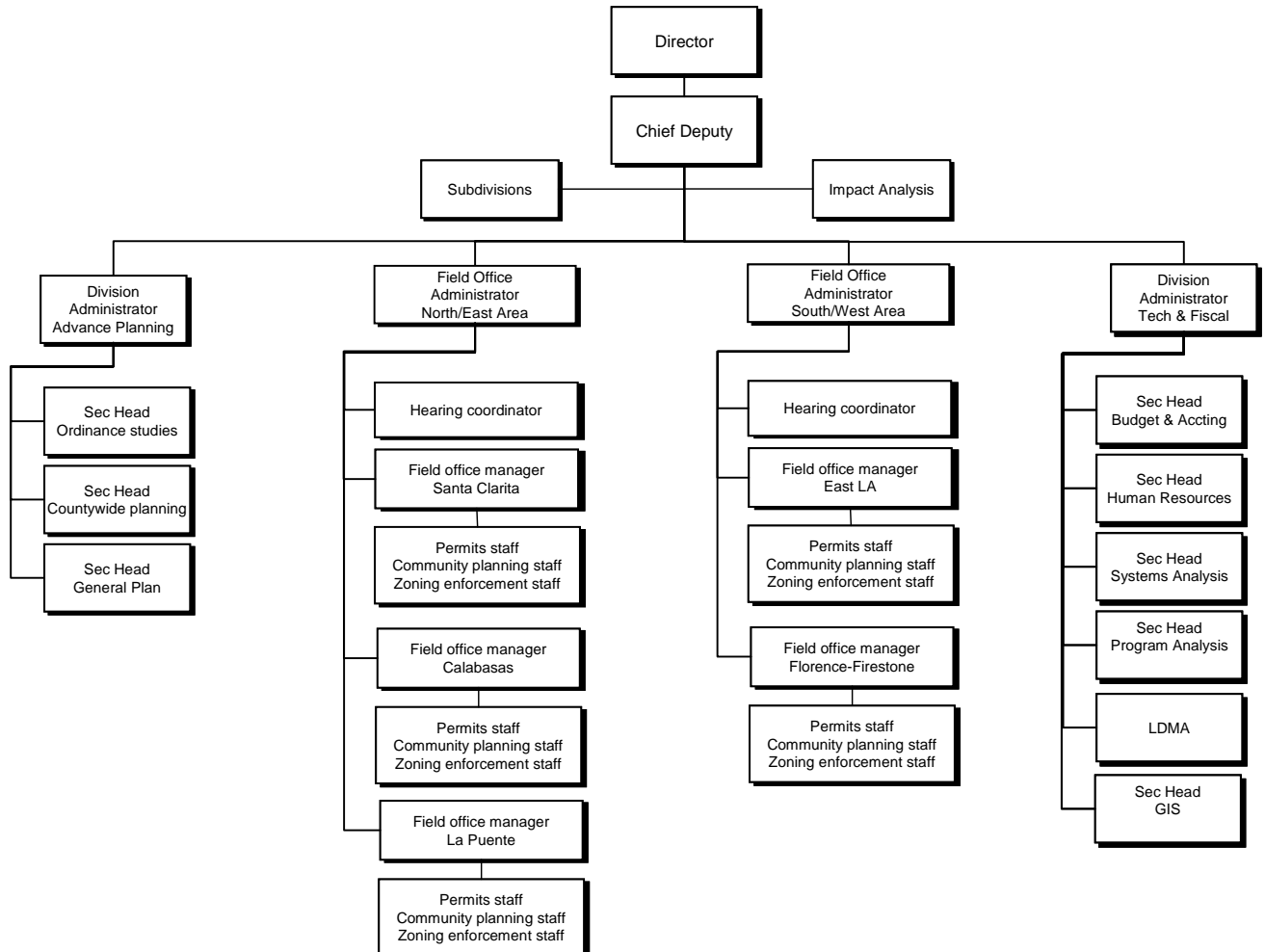
<sup>9</sup> KIVA is not an acronym. It is a brand name for a case tracking software product produced by the Accela Corporation. KIVA is named after a ceremonial structure used by Southwestern Pueblo Indian tribes.

of work encompasses the entire County and they should remain close to County policy-makers.

- Administrative staff should remain downtown in the Hall of Records in order to support all the field offices.
8. Once Hall of Records walk-in traffic declines suitably, close down the public counter. Retain limited staffing to handle phone calls or calls could be routed to planners in field offices. A variation on this would be to locate the field office serving East Los Angeles and Altadena in the Hall of Records to maintain a customer service presence in the building.

The organizational chart shown in figure 10 offers an alternative for implementing this recommendation. DRP should evaluate and implement this alternative or something similar.

**Figure 10 – Alternative for Restructuring**



# Section C – Planning Commission Operations

The Regional Planning Commission (RPC), is composed of five Commissioners who serve four-year terms. They are appointed by the County Board of Supervisors, one Commissioner per Supervisorial District. The RPC was established in 1922 by County Ordinance. The Commission administers the State Planning Act, State Subdivision Act, the California Environmental Quality Act and various County ordinances.

The RPC can approve use permits, tentative tract maps, minor land divisions, and zoning changes. They can also hear testimony on other permits and applications such as General Plan amendments and zone changes and advise the Board of Supervisors (who will approve or disapprove the matter). The RPC also hears appeals for decisions made by Hearing Officers (generally DRP managers who approve/disapprove less complicated use permits and other matters). RPC decisions have the force of law but can be challenged in Superior Court.

The RPC is assisted in their role by the Director of Regional Planning, the Chief Deputy and their staff. The DRP staff will typically analyze applications, research the relevant impacts, facts, regulations, ordinances and statutes and provide recommendations to the RPC.

The RPC meets weekly in the Hall of Records in a public forum. For controversial matters, RPC deliberations can become quite contentious and vocal. However, our research revealed that most stakeholders and interested parties believed that the RPC process is fair, visible, accessible and without apparent bias.

## Meeting Protocols

During RPC meetings, a secretary records the meetings and takes notes in order to write summary minutes and a court reporter takes court notes. The notes are typed only upon request. The use of summary minutes taken by the secretary is appropriate, but most other jurisdictions have the secretary use a notebook computer to expedite the completion of the minutes.

## Availability of Information

Some basic information and visual aids regarding the hearing proceeding are not readily available to the general public:

- Commission and staff nameplates are too small to be read by the audience. Audience members should be able to know who is talking, even from the back of the room.
- It is hard to discern which item is being discussed. Displaying a large sign or computer screen showing what item is being discussed would eliminate this problem.

- People testifying are sometimes hard to hear in the audience. It may be a simple placement of the microphone or other technology issues.
- Most jurisdictions use speaker slips. Anyone wishing to speak for or against a matter before the Commission files an appropriate slip. This helps the secretary with the record and also allows the chairperson to have good control over speakers.

Most of these problems are easily solved and would make the public forum much more user-friendly.

### Use of Technology

RPC meetings are held in the Planning Commission's chamber on the first floor of the Hall of Records. This chamber does not appear to have been updated since its original construction. There is a lack of modern technological aids such as:

- Functioning monitors for each Commissioner to see staff exhibits,
- Electronic versions of staff reports available to the Commission on monitors or laptop computers, and
- Staff reports and graphics projected on-screen and monitors using PowerPoint, VCR clips and digital photos and maps.

Currently, the staff tacks hand-drawn presentation material on boards located behind the Commissioners. The location of the boards makes it difficult for some of the Commissioners to view them. The scale of the presentation material is adequate for the Commissioners to understand, but too small for the public to view.

#### **Recommendation C-1: Adopt various visual and procedural improvements**

The RPC should evaluate the chamber for ease of viewing and hearing the proceedings, monitoring agenda items, and viewing written reports. For example, large nameplates, providing copies of written reports or a binder in the back of the room, posting the item number on a sign or a computer screen, and monitoring speaking volume should be provided or implemented.

### Expeditious Decision Making

One of the biggest customer complaints is the timelines and how long it takes to get a final approval for a project. Currently it takes a minimum of 90 days to schedule an item on the Commission's agenda and frequently longer.

Once at hearing, the RPC takes public testimony and indicates their tentative approval or denial of the project as proposed, or indicates their tentative approval of a modified project and/or the conditions. The public hearing is then closed until a certain date to allow the County Counsel to review conditions and findings. After County Counsel review, the item is included as a consent item on the RPC agenda for final action.

Counsel can, and often does, recommend changes to the proposed findings and conditions. This review and related recommendations takes between six and ten weeks (with an even

longer review period if an EIR is involved). Planning then modifies the original findings and conditions to reflect County Counsel's directions.

Currently, County Counsel reviews proposed conditions and findings for every project heard by the RPC. However, a better practice would be to limit County Counsel review to certain types of projects such as those with EIRs, some sort of controversy and/or public opposition, or scheduled to be heard by the Board of Supervisors.

The Commission meets once per week in the morning and is reluctant to meet more frequently. Unfortunately, this schedule does not provide enough time to address all cases in a timely manner, thus causing an ever-increasing backlog of scheduled cases. The Commission should consider meeting for a longer portion of the day in order to catch up on the backlog of cases. Through augmenting the RPC schedule, this can be accomplished in three to five months. As a benchmark, DRP should be able to schedule new cases for hearing within 45 days of determining that it is ready for a public hearing. Consent items should return to the Commission within four weeks.

### **Recommendation C-2: Expedite RPC proceedings**

Until it is feasible for Current Planning to schedule cases at the Planning Commission within 45 days of completion, the Commission should meet morning and afternoon. At the midpoint in the day, a one-hour lunch break should be scheduled. The hearing would then continue until all items are heard or 6 p.m. arrives, whichever occurs first. Estimated cost = \$11,000 in additional stipend costs.

DRP staff's recommended conditions and findings should be in a format that can be adopted at the first hearing with minimal modifications. Actual dates of meetings, summary of testimony and actions can be added after the hearing.

For most projects, especially simpler ones, the Planning Commission should take final action, formalize changes to the proposed conditions or findings, and adopt the conditions and findings on the same day as the hearing.

County Counsel should review the Planning Commission's tentative approvals within two weeks of said hearing. The item should be placed back on the Planning Commission's calendar within three to four weeks. This time frame should be feasible since the Planning Commission should take final action without Counsel review on all items that do not have an EIR, significant controversy or are scheduled for the Board of Supervisors.

## Section D – Advance Planning

The Advance Planning Division is charged with preparing plans and programs to guide development and growth in the County, revitalize communities and improve the quality of life for County residents. The division uses tools such as the Countywide General Plan, Community and Area Plans and various ordinances to implement their mission. The division relies heavily on public input to shape their planning efforts.

Advance planning documents are organized into a hierarchy based on level of detail, geographic scope and their statutory basis. These documents include:

- **Countywide General Plan.** County General Plans are required by Government Code Section 65300. The General Plan is the supreme document guiding future physical development of the County. The Plan contains several elements or sections, several of which are required. These include:
  - A land use element addressing density and land use,
  - Circulation element addressing transportation,
  - Housing element,
  - Conservation element dealing with flood control, natural resource conservation and pollution,
  - Open space element addressing conservation of open space,
  - Noise element dealing with noise abatement, and
  - Safety element addressing seismic safety, wildfire prevention, etc.
- **Community or Area Plans.** Community or Area Plans complement the General Plan and contain many of the same elements such as land use and circulation. As with the General Plan, these plans have the force of law behind them. These plans cover areas where significant land use issues have arisen or where community support for a plan exists. See Appendix 4 for a map showing adopted Community and Area Plans.
- **Zoning.** The Zoning Ordinance, Title 22 of the County Ordinance, is authorized by Government Code Section 65850. The Zoning Ordinance converts the land use designations in the General Plan into specific land use standards and guidelines. The Zoning Ordinance is the implementation tool for the Countywide General Plan and must be consistent with the General Plan at all times. Complementing the Zoning Ordinance is the zoning map. Actually a series of maps, these documents show the zoning designations for each parcel in unincorporated Los Angeles County.
- **Community Standard Districts (CSDs).** A relatively new land use regulation tool, CSDs are akin to area-specific Zoning Ordinances except that they are limited to a specific area and are typically written to deal with specific land use issues such as height and setback limits.

- Other planning tools such as Transit Oriented Districts (created to encourage development around mass transit stations) and specialized studies dealing with issues such as airport land use.

## General Planning

### Status of the General Plan

The County's General Plan was first adopted in 1973, a time when the County had significantly more open space and unincorporated land. Since it was originally developed the General Plan has been updated periodically. During the late 1970s, the General Plan received a comprehensive update with all elements rewritten and new ones added. This updated General Plan was adopted by the Board of Supervisors in 1980. Since that time, the General Plan has been relatively static with some exceptions such as the housing element that must be updated every five years pursuant to State law. The safety element was also updated recently to account for new seismic safety standards.

Of course, land use patterns in the County have changed significantly since 1973. There has been much residential and commercial development in Santa Clarita and the Antelope Valley. Density has increased in the urban core and the Westside. There have been major incorporations such as West Hollywood and Malibu. The economy is much less dependent on large defense and aerospace plants.

In light of these changes, DRP recently began a comprehensive update of the General Plan. The update will include all required elements. The amount of \$300,000 was originally appropriated for the project. At that time the project did not include an Environmental Impact Report. This omission was challenged by a local environmental advocacy organization. Subsequently an environmental impact review was included doubling the cost to \$600,000. The update should be complete by 2003.

### Status of Community/Area Plans

Los Angeles County currently has adopted 12 Community and Area Plans. Many of these plans were prepared in response to requests by communities to implement specific land use standards that were not available from a more generic document such as the General Plan. These Community and Area Plans are popular with local constituents who feel that the local land use issues they face cannot be accommodated without a focused planning document that addresses their issues. Community Plans are often used to retain a certain neighborhood look and feel in the face of mounting development pressure. Specific examples include:

- Retaining open space and preventing high-density urban sprawl in the Santa Monica Mountains,
- Retaining the semi-rural atmosphere of Rowland Heights, and
- Upgrading neighborhoods and improving commercial zones in unincorporated parts of South Central Los Angeles.

Community planning, in essence, is the process that would be undertaken if these communities were municipalities conducting their own general planning process. This gives these communities the benefits of having a specific general plan without the expense of

having a full-time planning department. This demonstrates a high level of responsiveness to constituent concerns in the unincorporated areas.

Community Plans can have a major impact on land use, density and land values. The Santa Monica Mountains North Area Plan resulted in substantial reductions in allowed densities.

The Santa Clarita Valley Joint Land Use Area Plan is a joint effort between the City of Santa Clarita and the County to create an area plan covering the City and the adjacent unincorporated areas. The plan recognizes that much of the development in the area, both within the City and on the periphery, will impact both jurisdictions. The plan also recognizes that much of the adjacent development will eventually be annexed to the City. This creates a vested interest in both the City and County to cooperate on an area plan.

Many of the Community and Area Plans in existence date from the mid-1980s and have not been updated since. The following table shows the current status of the plans:

**Figure 11 – Status of Community and Area Plans**

Community/Area Plan Name*	Date of adoption	Date of last update
Altadena	1986	Not updated
Antelope Valley Areawide General Plan	1986	Not updated
East Los Angeles	1988	Not updated
Hacienda Heights	1978	Not updated
Marina Del Rey Local Coastal Program	1990	1995
Malibu Local Coastal Plan	1986	Not updated
Rowland Heights Community General Plan	1981	Not updated
Santa Catalina Island Local Coastal Program	1989	Not updated
Santa Clarita Valley Area Plan	1977	1990
Santa Monica Mountains North Area Plan	2000	Not updated
Walnut Park Neighborhood	1987	Not updated
West Athens/Westmont	1990	Not updated

\* Called a Community Plan unless otherwise designated.

Many of the communities in unincorporated Los Angeles County have continued to evolve in the last ten to 15 years since many of the plans were developed. Changes in traffic patterns, development and demographics have altered the conditions that provided the impetus for the original plans. Festering issues exist in many communities that either are not covered by a Community/Area Plan or have a plan that is at least 15 years old. Many of the communities in unincorporated Los Angeles County have continued to evolve in the last ten to 15 years since many of the plans were developed. Meanwhile the County's General Plan is currently being updated but the land use element update will not include those areas covered by Community or Area plans. In addition, some areas of the County, such as the Florence/Firestone area could really benefit from a Community Plan but have not yet been programmed for one. However, the General Plan's land use element will include parcel-level land use plan categories for Florence/Firestone, as well as all of the other unincorporated communities which are not part of an adopted Community or Area Plan. DRP and the Board of Supervisors have shown an exemplary level of responsiveness in serving these communities rather than allow them to languish and eventually incorporate. The County should continue this tradition and update several of these plans.

**Recommendation D-1: Complete the General Plan update**

DRP should complete the ongoing update of the Countywide General Plan. This process, begun in 2001, will incorporate current land use, transportation and other quality-of-life issues into the County's overall vision for growth and development. Estimated cost=already budgeted.

**Recommendation D-2: Prepare a program for updating existing Community/Area Plans and creating new Community/Area Plans**

DRP should prepare a program for updating existing Community and Area Plans and creating new plans. Existing plans should be updated in a systematic fashion following the adoption of the updated Countywide General Plan to ensure that land use issues for all unincorporated areas are analyzed and addressed. DRP should create a criteria for programming the updates and identifying communities in the County that could benefit from a new plan. DRP should then rank these communities using the criteria and dedicate the Community Studies units within the Advance Planning Division to implementing the program. The resulting update schedule should be incorporated in the Annual Work Program of the Department.

In conjunction with this updating program, DRP should create a Community/Area Plan template with common land use designations and standards. This will simplify the updating process and create a common framework that will be easier for others to interpret.

## Zoning

Title 22 of the County Code, the Zoning Ordinance was first adopted in 1927. Since that time, hundreds of amendments and overlaying ordinances such as Community Standard Districts have reshaped Title 22 and added a high level of complexity. The Zoning Ordinance is widely criticized for being difficult to interpret or reconcile with other planning documents. The ordinance is very difficult for laypersons to interpret as there is no implementation guide or method for sorting through the various components. In addition to the traditional zoning components such as land use designations (e.g., residential, commercial, etc.) and development standards such as setbacks, the ordinance also includes the text of every CSD ordinance, two specific plans and other specialized land use sections such as adult businesses.

In addition to having problems in organization and interpretation, the ordinance does not incorporate new concepts in land use regulation such as performance-based zoning. Currently, the ordinance specifies each allowable land use within each designation (e.g., florists are allowed under C-1 but not R-1). Each zoning designation identifies 1) "permitted uses" which are uses allowed by right, 2) "uses subject to Director's Review" which are uses subject to a ministerial or administrative review by staff, and 3) "uses requiring a Conditional Use Permit" (CUP) which are uses that because of their unique characteristics require notification of surrounding property owners and public hearings. A relatively new concept in land use regulation called "performance-based zoning" does not attempt to address every

conceivable land use or type of business, rather it relies on defining the allowable impacts of a land use. For example, a specific parcel could support several residential and commercial uses as long as certain impacts such as noise or traffic were avoided. Each specific residential or commercial use would not have to be rezoned or run through a discretionary review process. Performance-based zoning reduces restrictions on land use from traditional zoning and facilitates redevelopment and more creative use of land without creating negative impacts. Performance-based zoning can be difficult to implement but is recognized as a viable concept and is catching on in various jurisdictions around the nation.

DRP budget requests in the past couple of years have included Zoning Ordinance overhaul projects, but these requests have never been approved due to fiscal constraints. During the summer of 2001, DRP drafted a plan to comprehensively revise the Zoning Ordinance. This plan seeks to improve consistency among the various planning documents, improve the intelligibility and ease of use, enhance the flexibility of zoning and the ability of the ordinance to respond to changing conditions, and incorporate public input into the revision process. The revision is a two-year process. Implementing this revision would require dedication of DRP staff and retaining outside consulting help.

In addition to the revision, the zoning map, separate from the ordinance in that it applies the zoning designations to individual parcels, would have to be updated to reflect not only the new designations in the zoning revision but also the updated land use element in the General Plan. Failure to do so invites consistency challenges that can stop development and result in litigation.

### **Recommendation D-3: Revise the County Zoning Ordinance**

DRP should implement the Zoning Ordinance Revision program drafted during the summer of 2001. The Board of Supervisors should allocate additional funds for this purpose. DRP should hire a consultant to assist in the update and dedicate two Advance Planning staff full-time to the revision. The revision should also include new procedures for navigating, interpreting and implementing the Zoning Ordinance (e.g., how to notice residents, find out what a property is zoned, etc.). The revision should also incorporate new concepts such as performance-based zoning to facilitate more flexibility in land use and redevelopment.

The revised Zoning Ordinance should have a completely separate section for the ancillary components such as CSDs and specific plans. Other elements in the current ordinance such as adult businesses and yards should be incorporated into the main land use designations. This will improve the organization of the ordinance. The procedural guides should direct the reader on what components of the ordinance apply including CSDs.

### **Recommendation D-4: Bring zoning into consistency with the updated General Plan and Community/Area plans**

In conjunction with the Zoning Ordinance revision, the zoning map should be revised to be consistent with the updated General Plan and Community and Area Plans. The map update should be conducted after parcel-level zoning designations are input into the Department's GIS. This process will avoid any consistency challenges from members of the community.

## Community Standard Districts

Community Standards Districts (CSDs) have become a popular planning tool. CSDs are essentially mini Zoning Ordinances in that they apply specific land use standards to a specific geographic area or community. They are frequently used to implement a Community or Area Plan. CSDs are also frequently used to address a specific issue in a community. For example, a popular use of CSDs is to prevent “mansionization” or the replacement of existing houses with larger, bulkier houses. Residents dislike this trend because it can disrupt the character of an existing neighborhood, block sunlight, reduce privacy and eliminate lawns and green space. CSDs have been used to prevent mansionization by enforcing setback and height limits on residential development.

In other areas, CSDs are used to designate specific or unique design standards. The Acton CSD specifies that development incorporate a “circa 1890s Old West” theme including wooden storefronts and sidewalks, etc. In this manner, DRP is similar to a homeowners association in applying and enforcing discrete design standards.

Although CSDs have become a popular planning tool, there are several positive and negative issues with the planning tool and how it is implemented:

- They are an efficient response to constituent concerns about land use issues and demonstrate responsiveness on the part of County policy makers.
- They can be an effective tool for neighborhood revitalization or maintaining the unique and desirable character of existing communities.
- They reflect the difficulty of working with the existing Zoning Ordinance and the need to augment it with a related planning tool.
- Because they are designed to be implemented in conjunction with the rest of the Zoning Ordinance, it becomes extremely difficult to reconcile the CSD standards with the rest of the ordinance.
- CSDs sow confusion among DRP and Department of Public Works (DPW) staff who are supposed to interpret the Zoning Ordinance and provide answers to residents and property owners. The DPW staff has become so reluctant to provide guidance to property owners at their field offices on zoning matters that they have begun to send clients to the downtown DRP office to resolve what should be simple zoning interpretation matters. This obligates clients to consult with two separate agencies in two locations eradicating any benefits from “one-stop” service.
- Different CSDs frequently address the same issues yet there is no common template or process for creating a CSD. This results in significant duplication of effort.

### **Recommendation D-5: Develop a model CSD template**

DRP should develop a model CSD template using common land use designations and standards. This will simplify the job of those charged with implementing CSDs, including Land Use Regulation staff working in the field with CSD standards and DPW staff working with clients in field offices.

## Integration of Advance Planning and Other DRP Functions

DRP has a functional organization structure with staff performing either administrative, advance planning, current planning or code enforcement functions. This works well for instilling a singular focus on a certain type of service or planning product but at the expense of cross-functional collaboration. This is true for integrating advance planning work with that of the other divisions. Current planning and code enforcement can be considered downstream from advance planning in that they implement the products and concepts developed by Advance Planning staff. Current Planning staff issue permits and review development applications based on the policy documents created by Advance Planning. Land Use Regulation staff enforce the Zoning Ordinance and the CSDs developed by Advance Planning.

Advance Planning staff could benefit from closer relations with staff in other divisions that are implementing their work. For example, Land Use Regulation staff are out in the field observing local conditions and could provide valuable input on how zoning and CSDs relate to local conditions or on new land use issues that are emerging. Current Planning staff receive valuable input from property owners and businesspeople that could be incorporated into advance planning products. Although collaboration does occur, it often has to yield in priority to more pressing concerns such as current cases and violations. This type of horizontal communication should be encouraged through either organizational changes or by including other division staff into planning task forces especially if the Zoning Ordinance is revised or if common templates are developed for CSDs and Community/Area plans.

### **Recommendation D-6: Encourage Department-wide efforts in creating and updating advance planning work products**

DRP should develop a joint process with the Land Use Regulation and Current Planning Divisions for development of future CSDs and Community/Area Plans. Including staff from these divisions will incorporate knowledge from staff charged with implementing advance planning products into the development of those products.

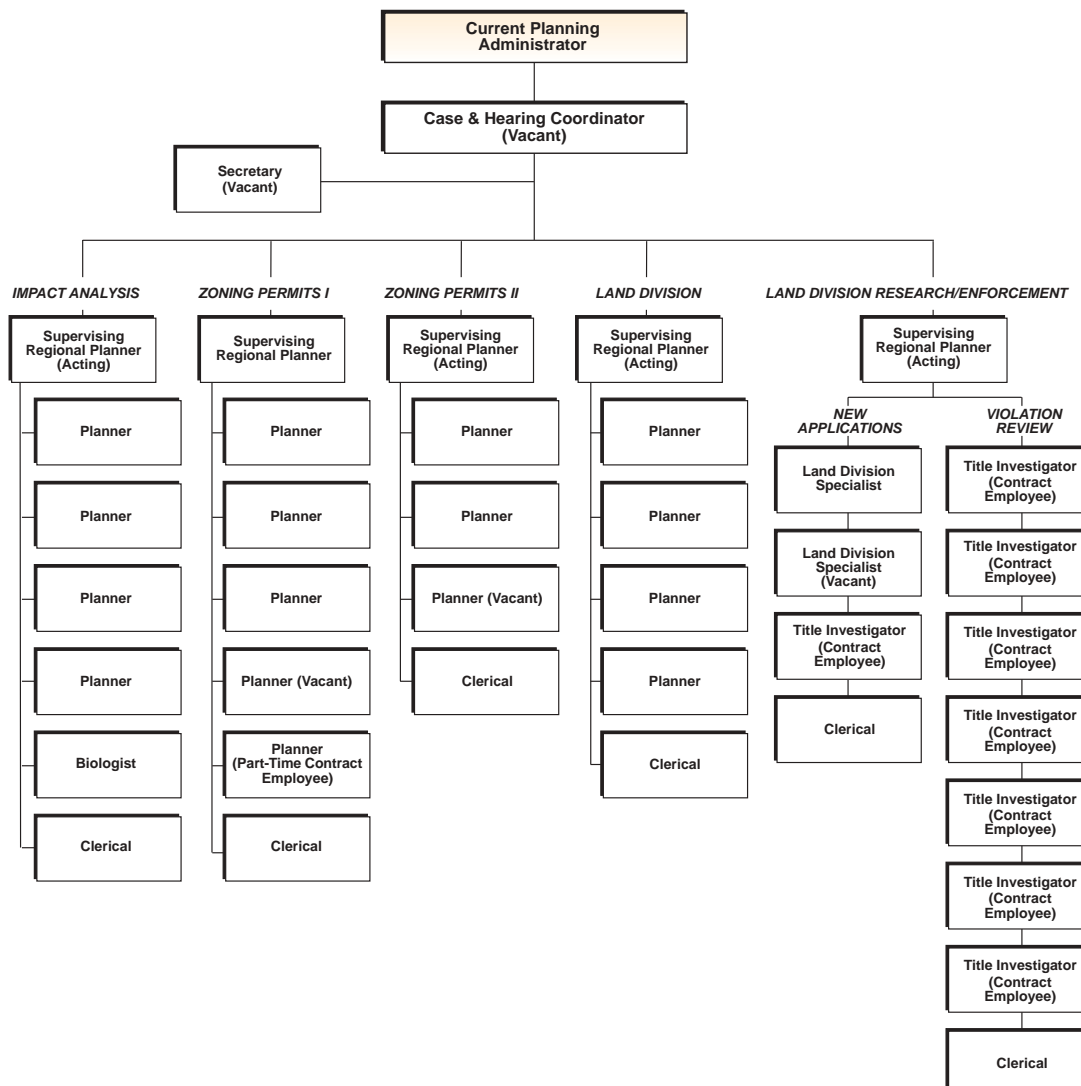
# Finding E – Current Planning

Current Planning is responsible for processing entitlement applications including a variety of discretionary permits, land division applications, privately initiated zone reclassifications and plan amendments and the related environmental review. The division is divided into five sections:

- Impact Analysis performs environmental reviews,
- Two separate zoning permit sections (i.e., Zoning Permit Sections I and II) process land use permits,
- Land Division processes subdivision applications, and
- Land Division Research and Enforcement (LDRE) researches and processes certificates of compliance or C of Cs.

The organization as of May 10, 2002, is shown below.

**Figure 12 – Organizational Structure of the Current Planning Division**



The Current Planning Division has a total of 32 budgeted positions, five vacant positions, 27 filled positions and nine contract staff.

A related function within DRP is the public counters, including the main counter in the Hall of Records and the counters staffed part-time at the DPW Building and Safety field offices. The staff at these counters answer questions about zoning, accept submittals, conduct one-stop meetings and review and sign off on simple plot plans. The public's first encounter with DRP's discretionary permit process is at the public counter. This critical function is currently organized under the Land Use Regulation Division even though the nature of the workload is more akin to current planning.

Another issue with the public counter service is that many simple applications, often nothing more than a simple plot plan of a residential parcel showing structures and a proposed addition or patio, are reviewed and signed off by DRP staff without collecting any type of plan check fee. Even though the review may be relatively simple and straightforward, a small plan check fee would augment DRP fee revenue, support non-self-supporting functions such as community planning, and mitigate any equity issues by charging fees for some services and providing others for free.

**Recommendation E-1: Transfer the public counter functions to the Current Planning Division**

The efficiency of the public counter directly impacts the processing of current planning applications. Transferring the public counter function, including field staffing, to the Current Planning Division, should decrease time delays and offer more consistent information to the public.

**Recommendation E-2: Consider relocating the Land Division Research and Enforcement (LDRE) unit to the Land Use Regulation Division**

In order to balance the workloads of the division administrators, the Department should evaluate the feasibility of transferring the Land Division Research and Enforcement functions to the Land Use Regulation Division. If minimal issues are identified the section should be transferred in order to provide a more balanced workload for the Current Planning Administrator.

**Recommendation E-3 – Consider instituting a small plan check fee**

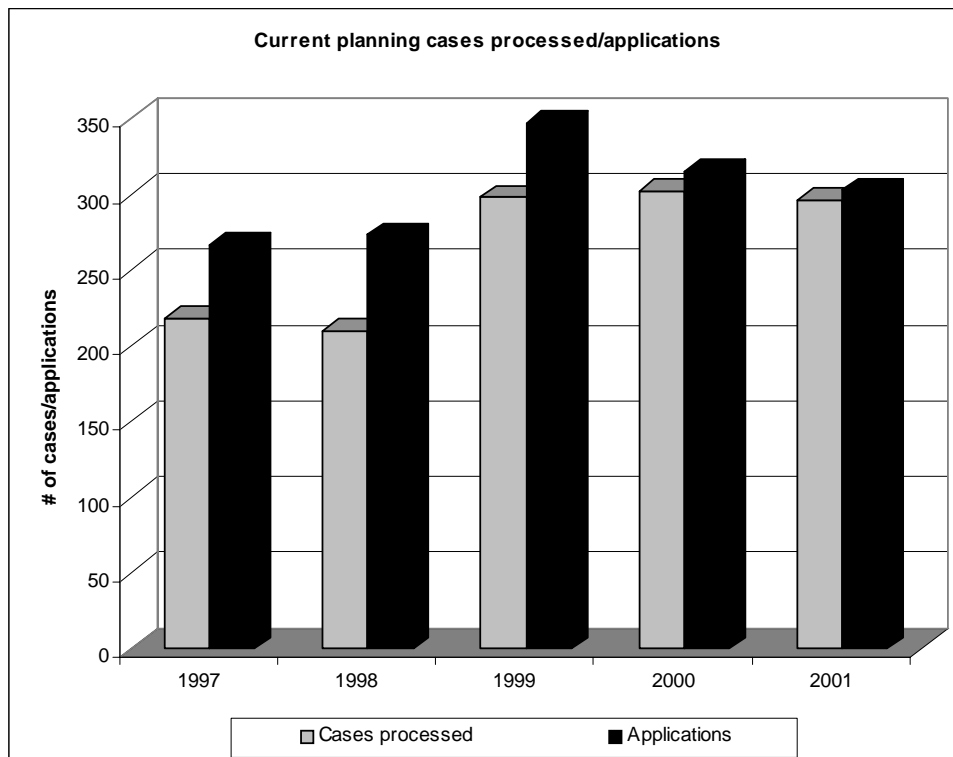
DRP reviews and signs off on hundreds of simple plot plans every year. For many of these plans, the review is provided without charge. DRP and the County should consider amending ordinances to allow for collection of a small plan check fee to defray the cost and provide funding for field office staffing.

## Current Planning Caseloads

We relied on statistical data from the Department's CTRK system to provide workload and caseload data. The data, however, is not completely reliable due to inconsistencies in data entry practices among the staff. Despite these limitations we are able to make some general conclusions about caseloads. All data is for the period of FY 97-01 unless otherwise stated.

Figure 13 presents the number of current planning cases and applications, not including initial assessment applications) by year. The data indicates that the current planning caseload over the last three years has remained relatively constant. Also the number of cases per planner, at approximately 30 cases per planner per year, is not unduly high.<sup>11</sup> This results in an acceptable employee/case ratio. The chart shows the trend in current planning cases.

**Figure 13 – Current Planning Caseloads**



Source: CTRK – Los Angeles County DRP

Figure 14 indicates the types of applications received during the 1997-2001 time period. The chart indicates that the majority of cases are Conditional Use permits. This could lead to the mistaken conclusion that the Zoning Permits Sections process significantly more applications than the Land Division Section. In reality many of the Conditional Use Permits are companion applications to subdivision cases. Therefore the caseload is distributed more evenly between the Zoning Permits and Land Division sections than the numbers first

<sup>11</sup> This assessment is based on observations from other jurisdictions. Caseloads have been observed ranging from ten to 90 per planner; 20 to 30 cases appear to be adequate based on these observations.

indicate. Zoning Permits process approximately 60% of the applications submitted while Land Division process 40%. However, the typical Land Division case is larger and more complex than the typical land use permit.

**Figure 14 – Type and Number of Applications Processed by Current Planning\***

<b>Application type</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>2001</b>
Animal Permit	2	3	7	3	5
Public Acquisition					1
Aviation Permit	1	1		1	2
Coastal Development	4	3	3	4	3
Cemetery Permit		2	1		
Conditional Use Permit	132	132	165	165	175
Development Agreement		1	1		
Highway Realignment		1	3	1	1
Mobile home Park		1			
Nonconforming Use	10	10	7	8	8
Oak Tree Permit	35	31	38	47	35
Plan Amendment	2	7	6	8	6
Parking Permit	14	10	10	16	6
Specific Plan			1		
Parcel Map	24	21	46	14	27
Surface Mining Permit				2	1
Revocation	1				
Tract Map	22	34	29	22	21
Variance	10	7	2	6	2
Zone Change	10	9	19	18	23
<b>TOTAL</b>	<b>267</b>	<b>273</b>	<b>347</b>	<b>315</b>	<b>303</b>

Source: CTRK – Los Angeles County DRP

\*Initial Assessments cases are not included on the above figure.

The County's system for processing discretionary use permits and subdivision maps is well established. Trained staff follows the established protocols and effectively takes cases from submittal to approval. A frequent concern from applicants is the length of time it takes to get an application approved. There are numerous small steps in the project approval process, each adding to the time delay.

Figure 15 indicates key steps in the review process for use permits and subdivisions heard by the RPC and the amount of time each step presently takes and what is being recommended as the ideal time frame based on best practices.

**Figure 15 – Process Timelines**

Process	Existing <sup>12</sup>	Required <sup>13</sup>	Recommended <sup>14</sup>
One-stop meeting request until date of meeting	6-8 weeks		2 weeks
Application submittal meeting request until date of meeting	4-6 weeks		2 weeks
Application submittal until date application is reviewed for completeness	4-6 weeks	30 days	4 weeks
Date application deemed complete until Planning Commission hearing	6-12 weeks	60 days <sup>15</sup>	6 weeks
Public hearing to final action	6-10 weeks		3-4 weeks

Sources: Los Angeles County DRP and Zucker Systems

A key issue is the fragmented nature of the process. In the current process no one person takes ownership for a case. Instead, overall responsibility for the expeditious processing of a case falls on several players. The one-stop session, if held, is managed by staff from the Land Use Regulation Division although planners from other divisions may attend. Once an application is submitted, a planner from the Permits or Subdivision Section takes control of that aspect of the process. If the project is subject to CEQA, the Impacts Analysis Section takes control. In addition, professionals in other County departments review the submittal. The responsibility for ensuring that the case is moved ahead and that all relevant analysis and reviews are performed on time is fractured. This lack of overall case ownership is a serious hindrance to expeditious processing of cases. Other jurisdictions have implemented measures to build up case ownership, notably assignment of case coordinators, administrators who monitor the progress of cases, or project managers, planners that oversee the whole review process in addition to reviewing the case.

**Recommendation E-4: Augment one-stop schedule and counter staffing to control backlogs**

DRP should set a goal of two-week turnaround from the time an applicant requests a one-stop meeting until the date of the meeting. When backlogs occur a second meeting day during the week should be established until the backlog is eliminated. When the schedule for application submittal appointments is backlogged more than two weeks, the public counter should assign another person to handle the extra requests.

DRP should also institute a small fee for one-stop meetings that would be applied to

<sup>12</sup> DRP's case tracking system, CTRK, cannot produce reliable data documenting case processing timelines. These figures are based on staff estimates.

<sup>13</sup> Required per the State Permit Streamlining Act, Government Code 65920.

<sup>14</sup> Recommended timelines are based on observed industry best practices.

<sup>15</sup> Sixty days for permits that do not require an Environmental Impact Report either because they are categorically exempt or there is a negative declaration.

the application. This will potentially cut down on the no-shows. Assuming an annual volume of one-stop meetings of 300, a fee of \$50 would yield revenue of \$15,000.

**Recommendation E-5: Hire former DRP staffers or consultants to address periodic backlogs**

In order to address periodic backlogs, DRP should establish a list of prequalified consultants and former DRP employees, such as retirees or those leaving for parenting reasons, to handle cases.

**Recommendation E-6: Implement a comprehensive project manager approach to project review**

Project managers should manage all aspects of a project including environmental assessment. When a project is assigned to the planner, he/she should handle it from the initial review stage through the approval hearings and implementation monitoring. There are numerous advantages to this approach. One of the most significant benefits is the elimination of the fragmented approach to project approval and monitoring, providing faster processing times and better customer service. While the present system allows a different staff member to be involved with a case, it is very inefficient and does not provide good customer service. Peer or team reviews and good supervision can mitigate any side effects such as tunnel vision or inappropriate relationships with project advocates or applicants.

Planners acting as project managers should be responsible for expediting the project through all its necessary approvals including those required by other County agencies. Functions of the project manager would include:

- Conducts pre-application/one-stop meetings as appropriate,
- Confirms application is complete,
- Collects and integrates comments from other departments,
- Attends or conducts project review meetings when necessary,
- Resolves interdepartmental problems,
- Challenges other department conditions when they appear inappropriate for the project,
- Coordinates citizen input and comments,
- Works with the applicant to solve problems and revise the project as appropriate,
- Manages timelines and ensures that they are met,
- Reviews and promptly notifies the applicant of omissions or problems with the project,
- Coordinates with key decision-makers,
- Writes and signs the staff reports,
- Presents at public meetings, and
- Field-checks prior to occupancy.

Prior to and concurrent with the implementation of the project manager system, Current Planning should establish a cross-training program, which should assist the planners' transition into project managers.

The next few pages discuss Current Planning services and processes and issues observed in each.

## Impact Analysis Process

Presently the Impact Analysis Section is responsible for the environmental review of all discretionary permits and land divisions. Environmental review is included with all project review and approval processes. It is intended to assure the every project is processed in compliance with CEQA. The California Environmental Quality Act (CEQA) is the driving force behind impact analysis. CEQA generally outlines the rules, regulations and procedures that need to be followed in performing environmental review.

Work products include the preparation of categorical exemptions, negative declarations and mitigated negative declarations and monitoring and reviewing the preparation of special environmental studies and Environmental Impact Reports (EIRs). The section handles approximately 20 EIRs and 150 other environmental documents per year.

The Impact Analysis Section has a section head, five professional staff members and one clerical person. There is also one vacant position. The professional staff is composed of four planners and one biologist. The section head also has biology knowledge and experience.

The Impact Analysis Section works with two committees, the Environmental Review Board (ERB) and the Significant Ecological Areas Technical Advisory Committee (SEATAC). The ERB consists of nine volunteers and meets once a month. This Board reviews all environmental actions when the project is near an identified sensitive resource in the Coastal Zone and determines if the project is consistent with the Malibu Land Use Plan. The SEATAC reviews projects in designated significant ecological areas. The members of this committee are all biologists.

If an application is determined not to be exempt, an initial study is prepared to determine whether the impacts warrant a more extensive environmental impact report or if a negative declaration or a mitigated negative declaration can be prepared. This step saves time and money for projects that are relatively benign. Figure 16 indicates the number of initial studies prepared by the Impact Analysis Section and as a percent of applications. Over time, half to two-thirds of the planning cases are not exempted from environmental review and require an initial study.

**Figure 16 - Initial Environmental Studies Processed and Ratio to Applications Submitted**

Application type	1997	1998	1999	2000	2001
Initial Study	92	160	180	118	187
% of Planning Cases	42%	76%	60%	39% <sup>16</sup>	63%

As part of the project's environmental review, mitigating measures are developed to assure that every action is taken to minimize the environmental impacts caused by a project. A

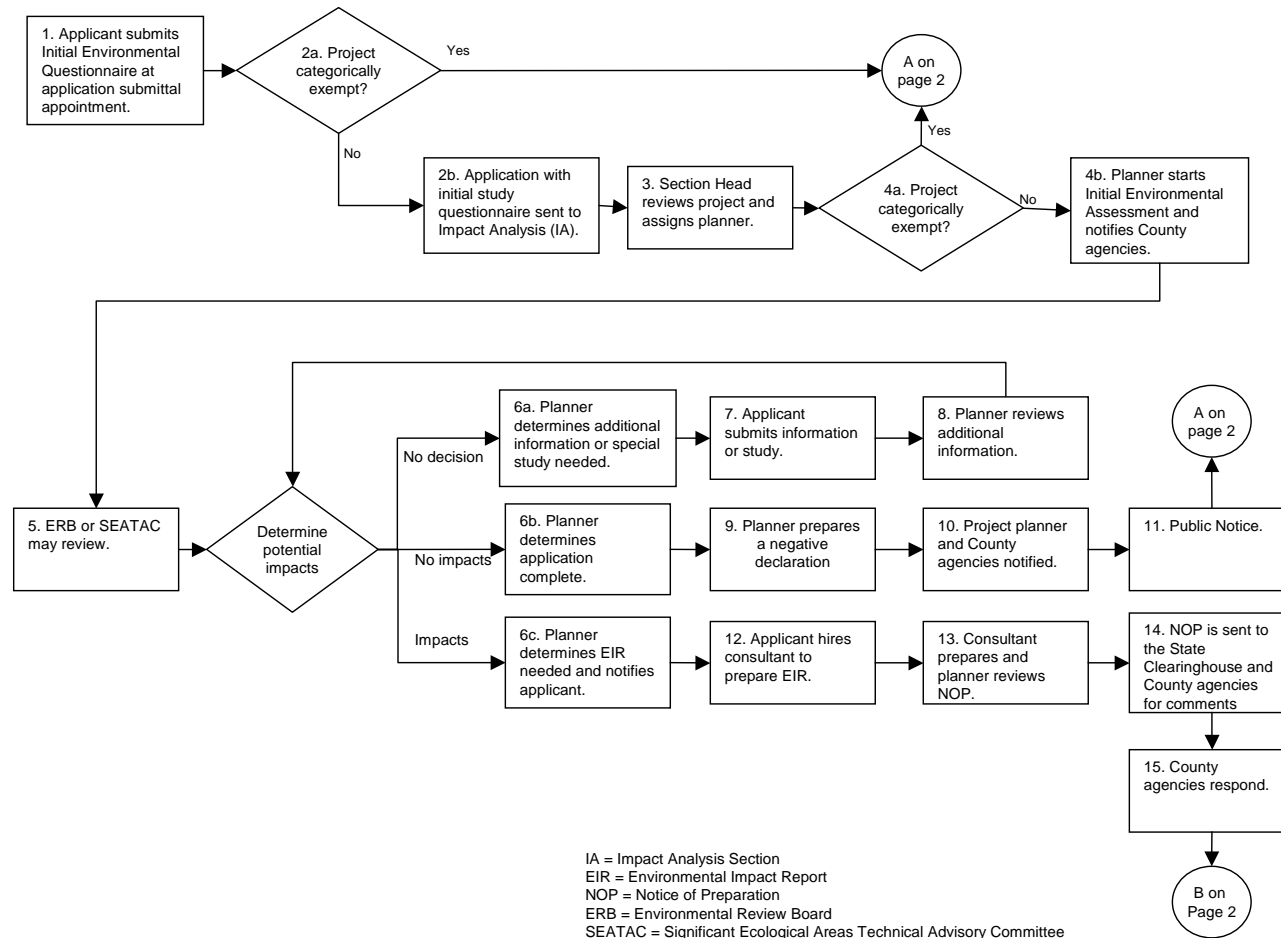
<sup>16</sup> The numbers from year 2000 appear to be an anomaly, perhaps due to a change in the record procedures.

Mitigation Monitoring Program is adopted as part of the project approval. State law requires that the adopted Mitigation Monitoring Program must be implemented. The applicant pays a fee for Regional Planning staff to check the project and assure the required measures are being implemented. Impact Analysis staff monitor projects for compliance with environmental mitigation measures while Zoning Enforcement staff perform inspections at intervals specified in the conditions of approval to ensure compliance with the Zoning Ordinance and the conditions of approval.

The process map on the following two pages shows the environmental review process in Los Angeles County. A detailed description of the process is found in Appendix 1.

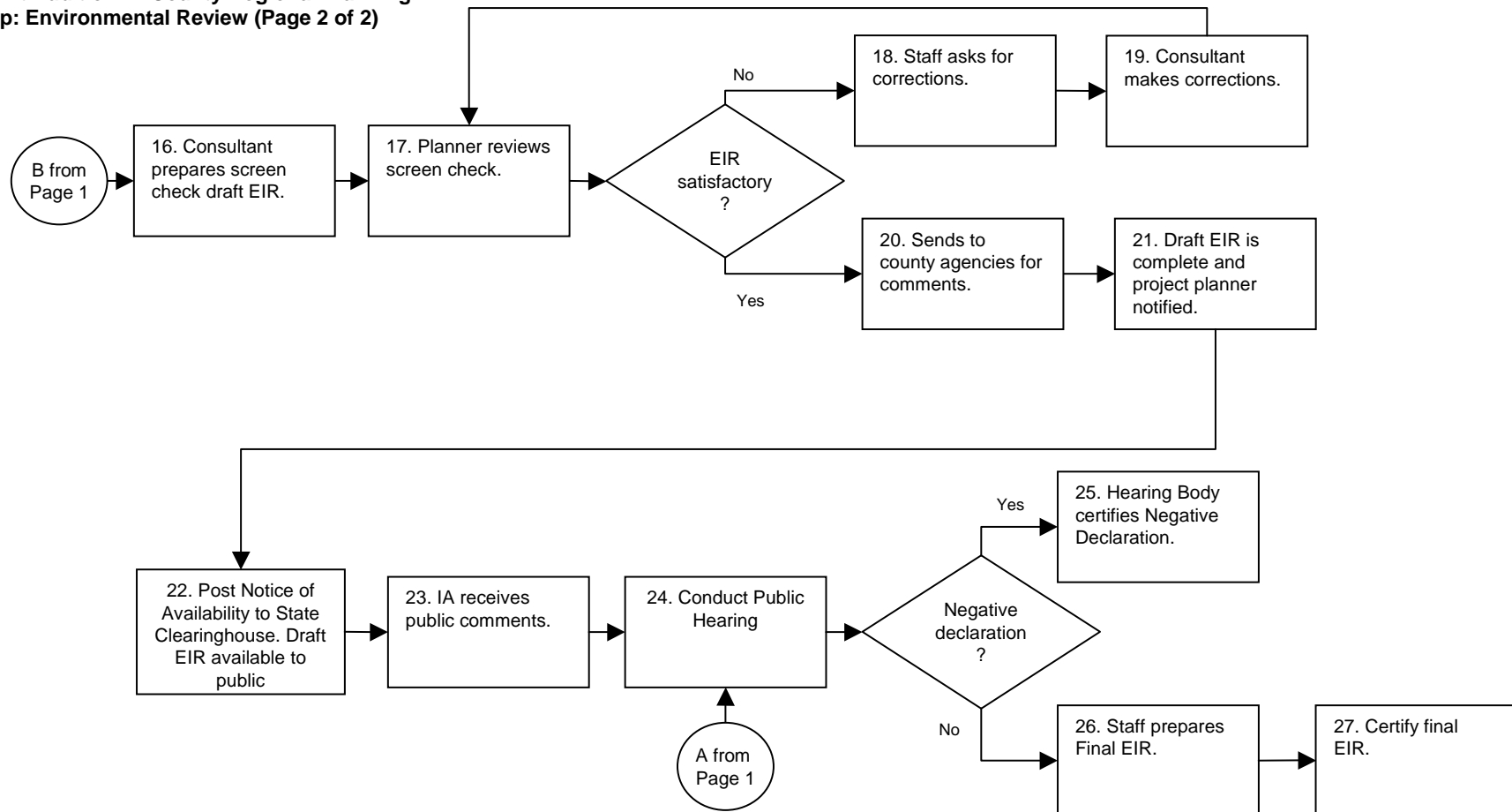
**Figure 17 – Environmental Review Process**

Mgmt Audit of LA County Regional Planning  
Map: Environmental Review (Page 1 of 2)



**Figure 17 – Environmental Review Process**

Mgmt Audit of LA County Regional Planning  
Map: Environmental Review (Page 2 of 2)



The environmental planner starts the Initial Assessment and notifies appropriate County departments. This step needs to be completed within a 30-day review period. Presently the 30 days are counted from the time the application is received in the section. Legally the review to determine if the application is complete needs to be performed from the date it is received by the department, not the section. Presently it is not unusual to take another six weeks from the date the project is received by the planner. The importance of integrating the environmental review with the overall project review process cannot be understated. When separate units of a planning agency perform separate components of project review it becomes much more difficult to coordinate the reviews.

Planners in the Impact Analysis Section stated that they sometimes hold onto the application, considering it incomplete, until they have enough copies to forward it to the appropriate agencies. They contact the applicant directly and request additional copies of the application to be submitted directly to them. After the additional copies are received they forward the application to the agencies for comments. This delay can negatively impact processing timelines.

Additional processing problems observed at DRP include:

- Impact Analysis planners do not attend the one-stop or the subdivision review meetings,
- Planners do not always visit sites early in the process. Oftentimes, issues are discovered during site visits that can derail a case that had cleared the environmental review process. If these issues are identified early they can be incorporated into the initial environmental assessment step.
- When revised maps or plot plans are submitted by applicants, they are not sent back to the Impact Analysis Section for a subsequent review of the revisions,
- There is limited communication between the project reviewer and Impact Analysis staff, and
- Impact Analysis staff do not notify the other sections about project changes they are requesting.

**Recommendation E-7: Change role of Impact Analysis to provide support for case planners**

Some of the Impact Analysis Section's functions should be shifted to the case processing sections. The Impact Analysis Section should be the lead for developing the modified environmental review process for Current Planning. The goal should be to provide the case planners in Land Division and Zoning Permits the appropriate assistance and training in the environmental review field so that they can transition to a "project manager" role overseeing the entire review process.

The emphasis of the Impact Analysis Section should change to provide expert assistance on environmental issues for project managers in the case processing sections. The Impact Analysis Section would continue to be responsible for EIRs and special environmental studies. They should also prepare guidelines and development standards and identify impact thresholds that will allow for easier environmental assessments.

The first step of implementing the change would begin with the Zoning Permits II Section planners performing initial environmental reviews for projects considered by a Hearing Officer. If this proves successful, a similar approach should be used for the Land Division Section by having their planners perform initial assessments for parcel maps. The Impact Analysis planner that is assigned to the case review sections would become permanent staff in each section. They also would become project managers with the additional responsibility as section liaison with the Impact Analysis Section.

**Recommendation E-8: Zoning Permits Sections should perform preliminary environmental reviews**

The Zoning Permits Section should establish a process whereby they would perform preliminary environmental reviews for certain types of permits (e.g., simple conditional use permit, all permits scheduled for Hearing Officer consideration, use permits types that historically have had negative declarations) on a trial basis. A planner with experience in the Impact Analysis Section should be assigned to the Zoning Permits Sections to assist and train in the procedures.

If the trial proves satisfactory, the program should be expanded into the Land Division Section for parcel maps. With success over a period of time the project managers in all project processing sections should be permitted to perform the initial environmental assessments.

**Recommendation E-9: Expedite initial project reviews**

The Impact Analysis Section should be provided the agenda of the one-stop meetings in advance. They should review the agenda and attend the meetings for those projects that appear to have environmental issues. In addition, for land division cases, an environmental planner should attend the first subdivision review meeting and identify any outstanding issues or indicate that the environmental review is completed. If it is not complete, a letter stating what is still needed should be given to the applicant. For Use Permits, a letter should be sent outlining all outstanding issues and what information is needed or stating that the environmental information supplied is complete. A copy of the letter should be given to the Zoning Permits planner. Recommended timelines, based on observations from other jurisdictions, are 30 days for determining if an application is complete and 30 days for preparing the initial assessment once the application is deemed complete (e.g., total of 60 days not counting delays imposed by the applicant).

**Recommendation E-10: Increase the number of application copies submitted to ensure adequate copies for County agencies**

The Impact Analysis Section should specify the type of use permit or map and the minimum number of copies needed for each type. For example, two additional copies would be needed for tract maps since the environmental application and map copies are almost always forwarded by the Impact Analysis Section to Public Works and Fire.

**Recommendation E-11: Expedite County agency review**

Based on observations from other jurisdictions, other County agencies should be given a maximum of 15 working days to comment on a project. This would allow another week

for the environmental planner to complete the review within the 30-day time frame.

**Recommendation E-12: Improve understanding of site issues**

Except for simple map applications, the project planner and/or the Impact Analysis planner should make every effort to visit the site early in the review process rather than waiting until the staff report and conditions are being prepared. This would ensure that all critical site issues (e.g., existing code violations, slopes, wetlands, etc.) are addressed in the environmental analysis and recommendation process.

**Recommendation E-13: Improve intra-agency communication**

The Current Planning Division should review the established systems for interaction between the case processing sections and the Impact Analysis Section. Possible changes in the system should include establishing scheduled meetings among the section heads of Impact Analysis and the other sections to regularly go over project status.

## Subdivision Process

The Land Division Section processes requests for tentative subdivision maps, tentative parcel map and lot line adjustments as well as accompanying applications. In addition to the above applications, the section also reviews final maps for conformance to the tentative map and revised exhibit “A’s” (i.e., maps and/or plot plans that indicate changes from original approval). The classic subdivision case is a tract of single-family residential home lots in the suburban fringe of Los Angeles. Subdivision planners deal with a lot of residential tract maps submitted by professional, sophisticated development companies as well as mom-and-pop types who are trying to split their single-family residential lot into two or three parcels.

The Land Division Section consists of a section head, four other professional planners, one principal regional planning assistant, two senior regional planning assistants, one regional planning assistant and one clerical position.

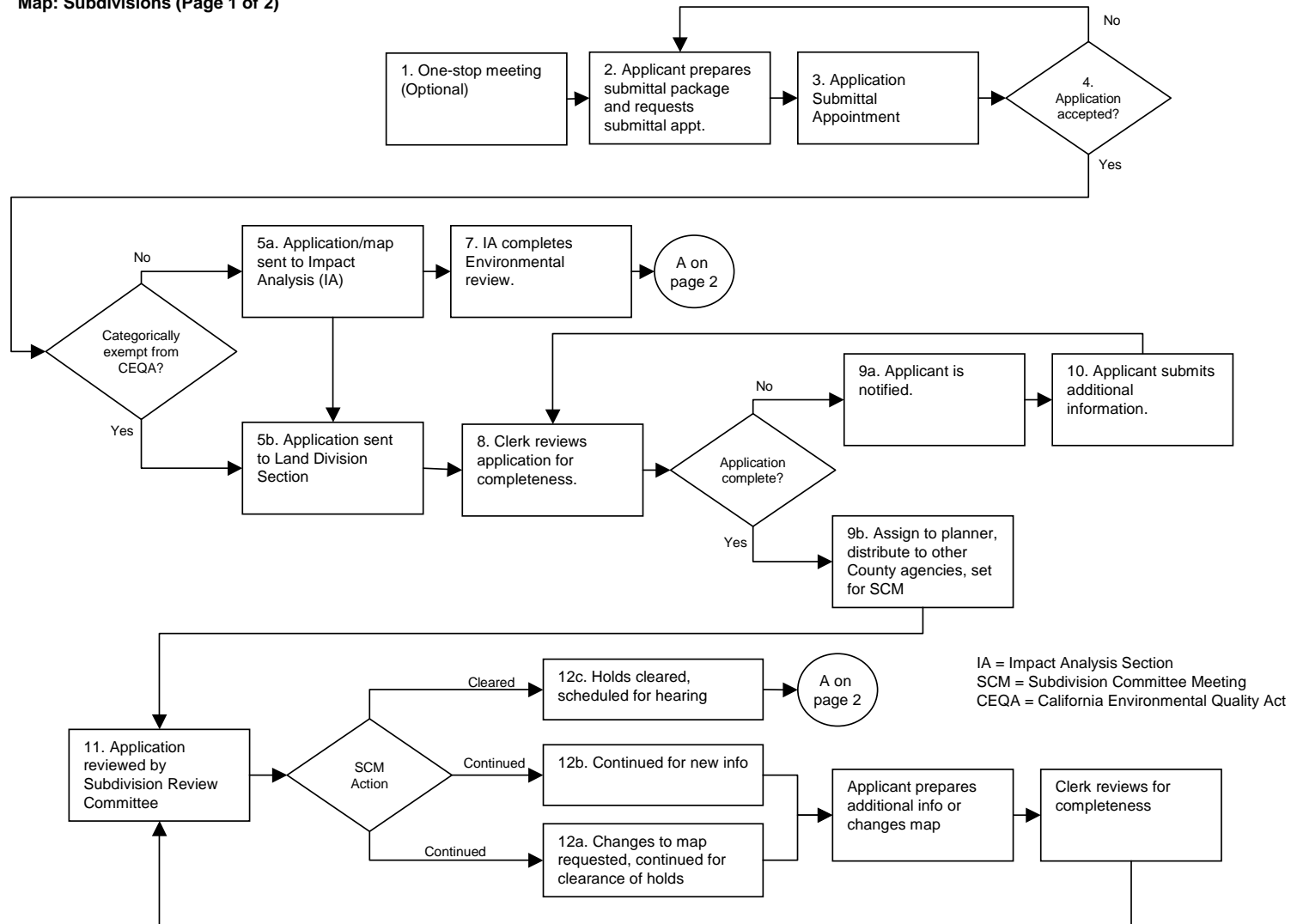
The Land Division Section coordinates its actions with other County agencies through the Subdivision Review Committee Meeting (SCM), which consists of one representative each from Public Works, Fire, Parks and Recreation and Health Services. DRP sets the agenda and runs the meeting. Presently, the committee meets once a week to review all tentative subdivision maps and tentative parcel maps. Maps are scheduled for the SCM 30-days after the application has been accepted. At the SCM, planning staff notifies the applicant if the application has been deemed complete or incomplete. This committee functions well and facilitates the process satisfactorily.

A single planner in the Land Division Section processes lot line adjustments. When completed, the Certificate of Compliance Committee reviews and approves the proposed lot line adjustment. After the lot line adjustment is approved and all conditions met, the Land Division Research and Enforcement (LDRE) Section prepares and records a C of C. As a result of this bifurcation of duties, two different sections of Current Planning are responsible for the final work product.

The process map on the following two pages shows the subdivision review process in Los Angeles County. A detailed description of the process is found in Appendix 1.

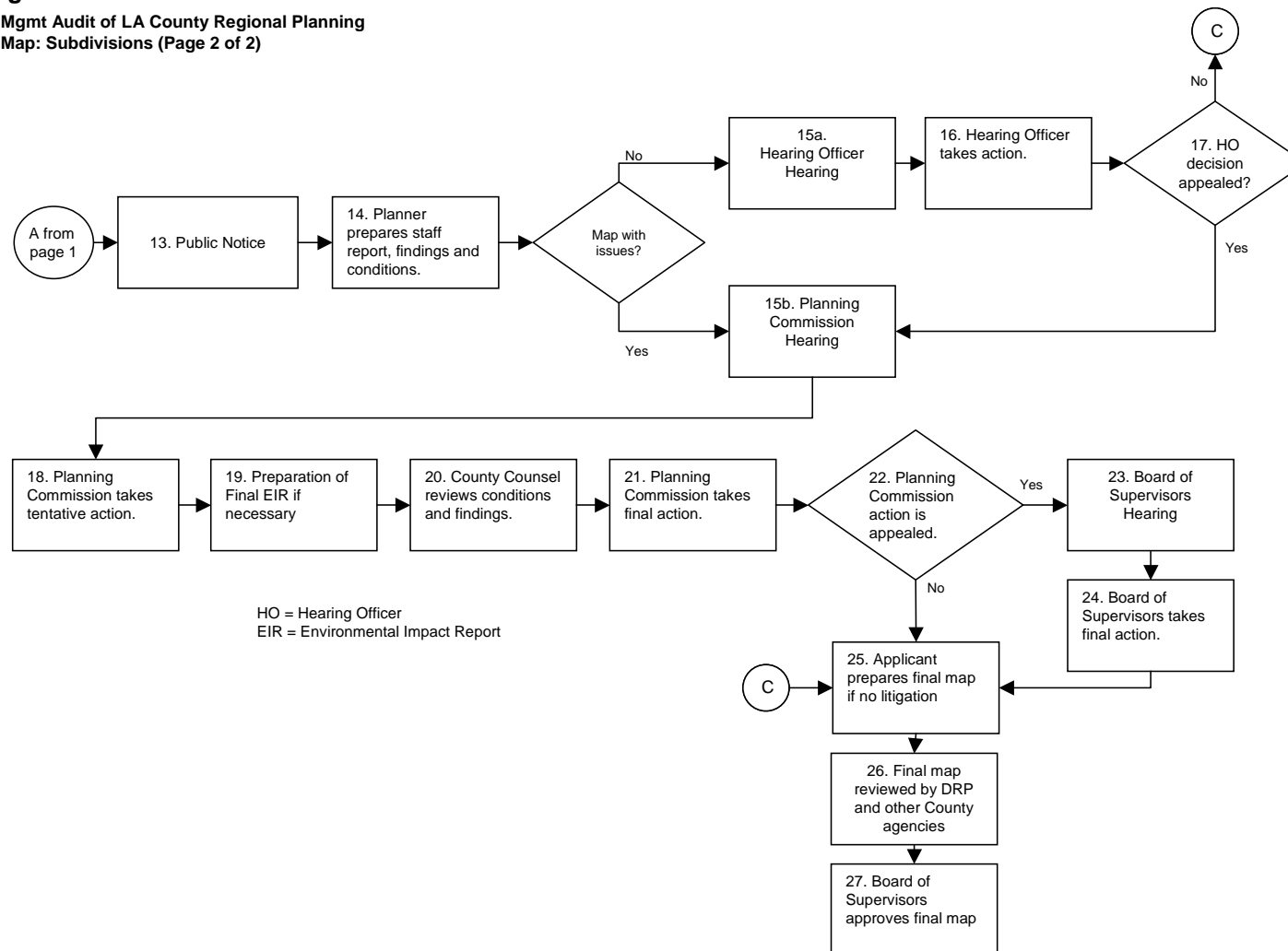
**Figure 18 – Subdivision Process**

Mgmt Audit of LA County Regional Planning  
Map: Subdivisions (Page 1 of 2)



**Figure 18 – Subdivision Process**

Mgmt Audit of LA County Regional Planning  
Map: Subdivisions (Page 2 of 2)



Specific process issues observed include:

- Prior to a subdivision being submitted to DRP the applicant has the option of attending a one-stop meeting. These meetings are offered by the public counter to provide information and direction to the developer. Due to the limited subdivision expertise of staff at the one-stop meetings, the main function of the meeting is to provide a potential purchaser/developer with areas of concern about the project before they commit their resources. However, by including subdivision staff these meetings could offer more value for certain applicants.
- The subdivision reviewer is not responsible for environmental review, a task that is handled by the Impact Analysis planner. The subdivision reviewer also does not follow up on inspecting conditions of approval. This task is assumed to be performed by DPW. The subdivision planner is also out of the loop when their project's final maps or revised Exhibit "A's" are reviewed. These revised documents are instead reviewed by another subdivision planner. This results in a number of processing handoffs that can cause processing breakdowns.
- Presently, this process takes between one and two weeks from the time the application is submitted to the time it is assigned to an Impact Analysis planner. According to State law, an initial determination that the application is complete and all necessary information has or has not been provided, needs to be performed within 30 days of submittal. In order to meet this deadline, the initial environmental review needs to be completed within 30 days. With the delay of getting the cases to Impact Analysis, it is almost impossible to comply with the State law.<sup>17</sup>

**Recommendation E-14: Provide more efficient public counter and one-stop service to applicants**

After an application is submitted, the counter staff should prepare the file, enter the application into the computer system and deliver it to the Current Planning sections including the Impact Analysis Section within 24 hours of submittal. Also, the Land Division Section should handle the one-stop process for subdivisions rather than the LDCC.

**Recommendation E-15: Integrate the environmental review process with the subdivision process**

The environmental status of the project should always be discussed at the subdivision Review Meeting. The Impact Analysis Section should either inform the Land Division Section, preferably in writing, of the project's status prior to the meeting or a representative should attend the meeting to discuss any outstanding issues.

In addition, the Impact Analysis Section should always receive a copy of the revised map in order to determine if the revisions impact any environmental resources.

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<sup>17</sup> Fortunately, for the County there are no administrative penalties. Furthermore, although the law states that overdue applications are to be deemed complete, despite whatever impacts may result, this is almost never invoked by applicants.

### **Recommendation E-16: Consolidate Exhibit “A” and final map reviews with the original planners**

Whenever possible Current Planning staff should assign Final map reviews to the planner who worked on the original case. Revised Exhibit “A’s” should first be reviewed by the case planner with concurrence of the section head.

## **Zoning Permit Process**

The Zoning Permits Sections process a variety of use permits. Most of these are discretionary permits which means that a public hearing and the final form of a project is decided by a review authority and can be denied outright (though that rarely happens). The bread and butter of the Zoning Permits Section is the Conditional Use Permit (CUP). CUPs are required for a variety of land uses from a regional landfill to a senior citizen unit depending on the allowed land uses as stated in the Zoning Ordinance.

Until recently, there was only one Zoning Permits Section. It processed permits applications heard by both the Planning Commission and Hearing Officers. Due to a growing caseload backlog the section was divided into two sections. The Zoning Permits I Section focuses on the larger, more controversial projects that go to the Planning Commission including privately initiated plan amendments, specific plans, zone reclassifications and CUPs.

The Zoning Permits II Section is responsible for minor applications that can be approved administratively (also called a “Directors Review”) or heard by a Hearing Officer (typically a DRP section head). Typical applications include: alcoholic beverage permits, wireless telecommunication facilities, senior citizen units, second dwelling units, animal permits, minor modifications to the parking standards and minor oak tree permits. If any of these applications become more complicated during the review process they are sent directly to the Planning Commission for consideration.

The Zoning Permits I Section is staffed by one section head, three additional professional planners, one clerical person and one part-time contract planner who handles administrative reviews of site plans and modifications of Exhibit “A’s”. The Zoning Permits II Section has one section head, two professional planners and one clerical person. Both sections have one additional vacant planner position.

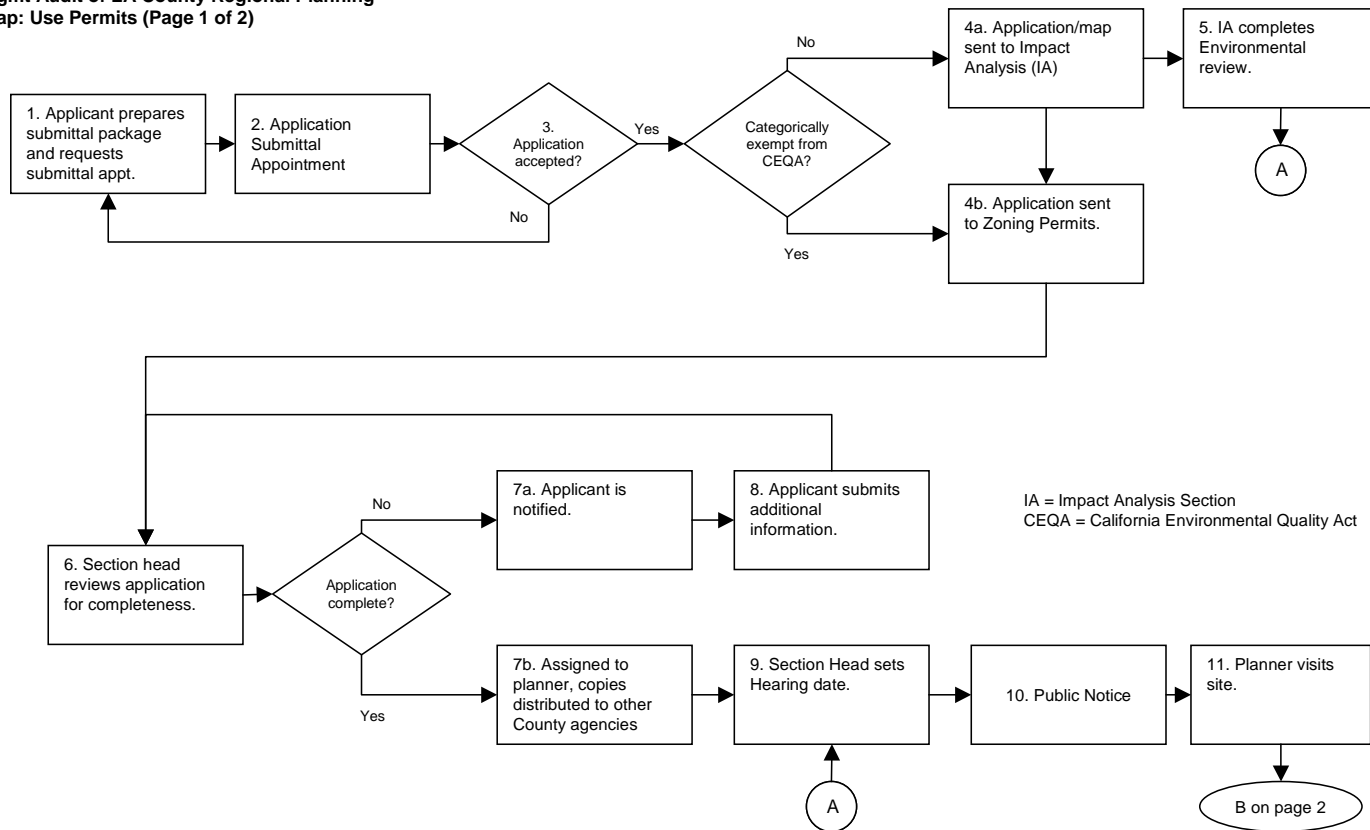
Both sections are working together to manage and reduce the existing backlog of cases which was between 50 and 100 cases during the period of our analysis. With extensive overtime by the section heads, they have been able to reduce the turnaround for first completeness review of applications from six months to two months. In addition, all new submittals are now being reviewed within a 30-day timeline. It is anticipated that in two months the backlog will no longer exist.

Unlike subdivision cases, fees for processing a use permit are based on a flat rate. This can result in insufficient revenue for the more complicated use permit cases. A system based on the level of effort involved would result in more equitable cost recovery.

The process map on the following two pages shows the zoning permit review process in Los Angeles County. A detailed description of the process is found in Appendix 1.

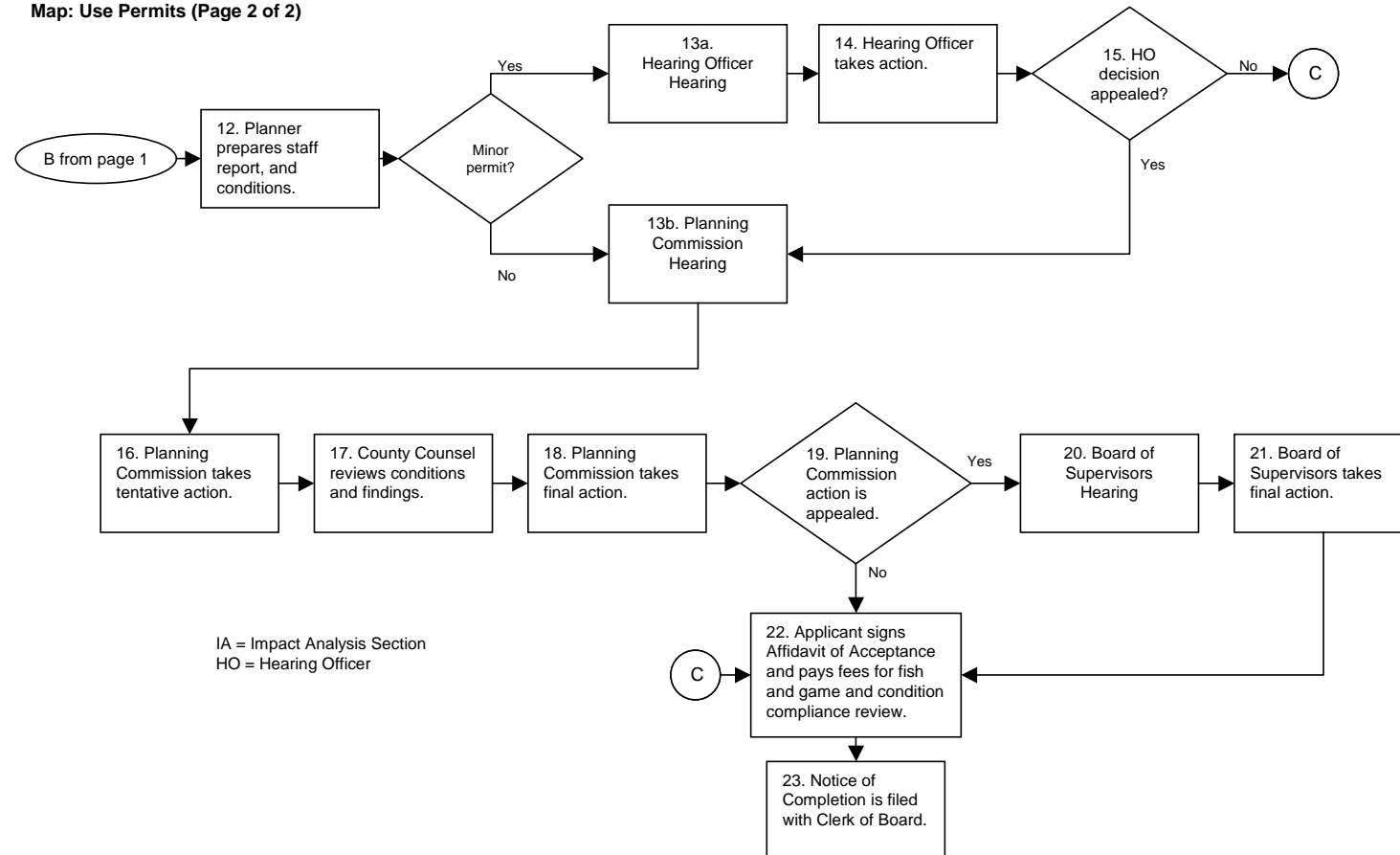
**Figure 19 – Zoning Permit Process**

**Mgmt Audit of LA County Regional Planning  
Map: Use Permits (Page 1 of 2)**



**Figure 19 – Zoning Permit Process**

Mgmt Audit of LA County Regional Planning  
Map: Use Permits (Page 2 of 2)



The processing of Use Permits in the Zoning Permits Sections is particularly fragmented. Project planners do not get assigned the cases until the sections heads review the cases thoroughly and determine that the application is complete. Meanwhile, the Impact Analysis Section is reviewing the application and making a determination regarding the project's environmental status.

The delays in processing are also considered an important issue to the customer. Frequently, it is heard that “it takes forever to get anything approved.” For this reason the State adopted process streamlining laws with mandated timelines for processing.<sup>18</sup> We concur that Los Angeles County timelines are too long at nine or more months. If there are no delays caused by the applicant, a typical project should be processed and heard with a final action within six months. Presently, there are numerous small steps in the project approval process, each adding to the time delay.

As mentioned earlier, zoning permits come in all shapes and sizes. Some are very complex and controversial, while others are simple and have limited controversy surrounding them. Consideration should be given to having more permits, such as second dwelling units or other minor permits, approved administratively with an appeal to a Hearing Officer or the Planning Commission. If this were to occur, applications would be processed faster, workload would be reduced, and scarce planner time would be available to deal with the more complex cases. The County has moved in this direction by recently enacting an amendment to the Zoning Ordinance specifying design standards for wireless facilities and allowing a lower level of review for telecommunication facilities with fewer impacts.

**Recommendation E-17: Management should recruit and fill the two vacant positions in the Zoning Permits Sections**

Filling these two vacant positions would alleviate some pressing issues such as case backlogs and the impending loss of the part-time retired employee who reviews Exhibit “A’s”.

**Recommendation E-18: Evaluate cost recovery of zoning permits**

The Technical and Fiscal Services Division should perform a cost analysis for the entire Zoning Permit Section. If the costs exceed the fee revenue, consideration should be given to establishing a deposit system, similar to subdivisions, for rezones and the more complex CUPs.

**Recommendation E-19: Expedite zoning permit process**

Management should consider establishing a formal pre-application process for Conditional Use Permits, especially those that may be considered by the Planning Commission. This process would be similar to the one-stop meetings for subdivisions.

Upon receiving the use permit application and prior to reviewing for completeness, it should be determined which Zoning Permit Section and planner will handle the case.

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<sup>18</sup> As mentioned earlier, there are no administrative penalties for exceeding State-mandated processing timelines. Furthermore, although the law states that overdue applications are to be deemed complete this is almost never invoked by applicants.

The project planner would then review the case and determine if it is complete. If complete the public agencies would be notified.

All planners who have been within the section for at least six months should be allowed to review applications for completeness. Newer planners should be mentored until they are comfortable in reviewing the application for completeness without assistance. The reviewing planner should prepare the letter to the applicant stating that the application is deemed complete or deemed incomplete and what additional information is required. The letter and the application should then be quickly reviewed by a section head or Principal Regional Planning Assistant (RPA) prior to sending off.

Applicants should be able to resubmit applications to a clerical staffperson who would review the revised submittal for conformance to the material requested in the letter. If there were any problems the assigned planner would be consulted.

#### **Recommendation E-20: Convert some use permits to minor permits**

In the same fashion as the recently adopted Zoning Ordinance amendment for wireless facilities, the Ordinance Studies Section and County Counsel should continue to look for ways to modify the Zoning Ordinance to classify additional discretionary use permits, such as second dwelling units, “minor permits” for which a Directors Review can be used if impacts are minimal. Appealed cases can then be sent to the Planning Commission for further review if necessary.

### Certificate of Compliance Process

Certificates of Compliance are documents that certify that a lot was created and recorded legally pursuant to State and County subdivision laws. They are required in specific circumstances such as a lot line adjustment, when a subdivision or parcel map has not been recorded, when the record indicates a lot has not been created under accepted methods or that a recording error might have been made for an existing lot.

The Land Division Research and Enforcement (LDRE) Section handles Certificates of Compliance or C of Cs. The scope of their responsibility includes:

1. Reviewing and approving new requests for Certificates of Compliance, and
2. Reviewing some previously approved Certificates of Compliance and determining if they were in fact issued legally.

No Certificate of Compliance can be issued without being reviewed by the Certificate of Compliance Committee (C of C Committee). After staff has completed their review the Certificate of Compliance Committee can approve the request, approves it with conditions or deny it. If it is approved, a Certificate of Compliance or a Conditional Certificate of Compliance is recorded for each of the lots.

In 2001, a Current Planning section head discovered that for several years, a certain planner had been illegally issuing Certificates of Compliance in exchange for illegal remuneration. During that time, this planner had issued 1,403 C of Cs. In response, besides firing the planner and referring the case to the District Attorney, DRP created the LDRE unit staffed with seven contract title investigators and one clerical person. The LDRE was tasked with processing all C of Cs, as well as reviewing the 1,403 existing C of Cs to determine which ones were illegally prepared.

LDRE performed 35 to 40 title searches per week for potentially illegally issued C of Cs and, as of July 2002, all of the 1,403 cases had a complete chain of ownership search. As of October 2002, about 1,200 of the 1,403 have had a complete review. Approximately 50% of the 1,200 certificates reviewed were found to be issued illegally. For those C of Cs issued illegally, the County must compel the property owners to correct deficiencies and reissue the certificates.

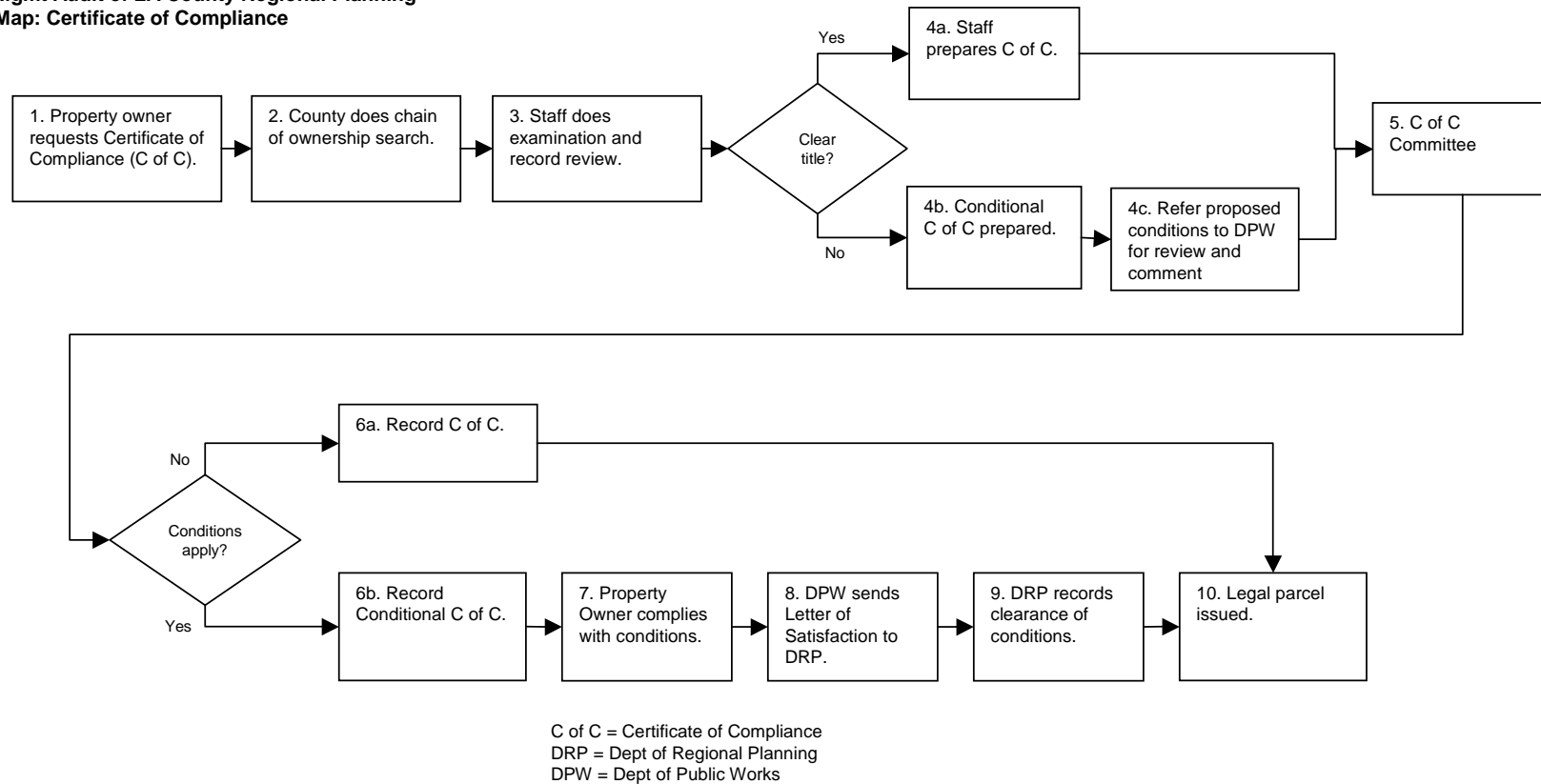
In order to prevent future problems of this type, the Certificate of Compliance Committee was established. Today no C of C can be issued without being reviewed by the committee. The committee meets once a week to thoroughly review each pending approval.

Within the LDRE Section, a land division specialist, a contract title investigator and a part-time clerical person are assigned to processing approximately 600 new requests for C of Cs per year. In addition to these new applications there is also a backlog of 100 new cases that have not yet been reviewed due to the emphasis on correcting the 1,403 C of Cs.

The process maps on the following two pages shows the C of C review process in Los Angeles County and the process used for reviewing illegal parcels. A detailed description of these two processes is found in Appendix 1.

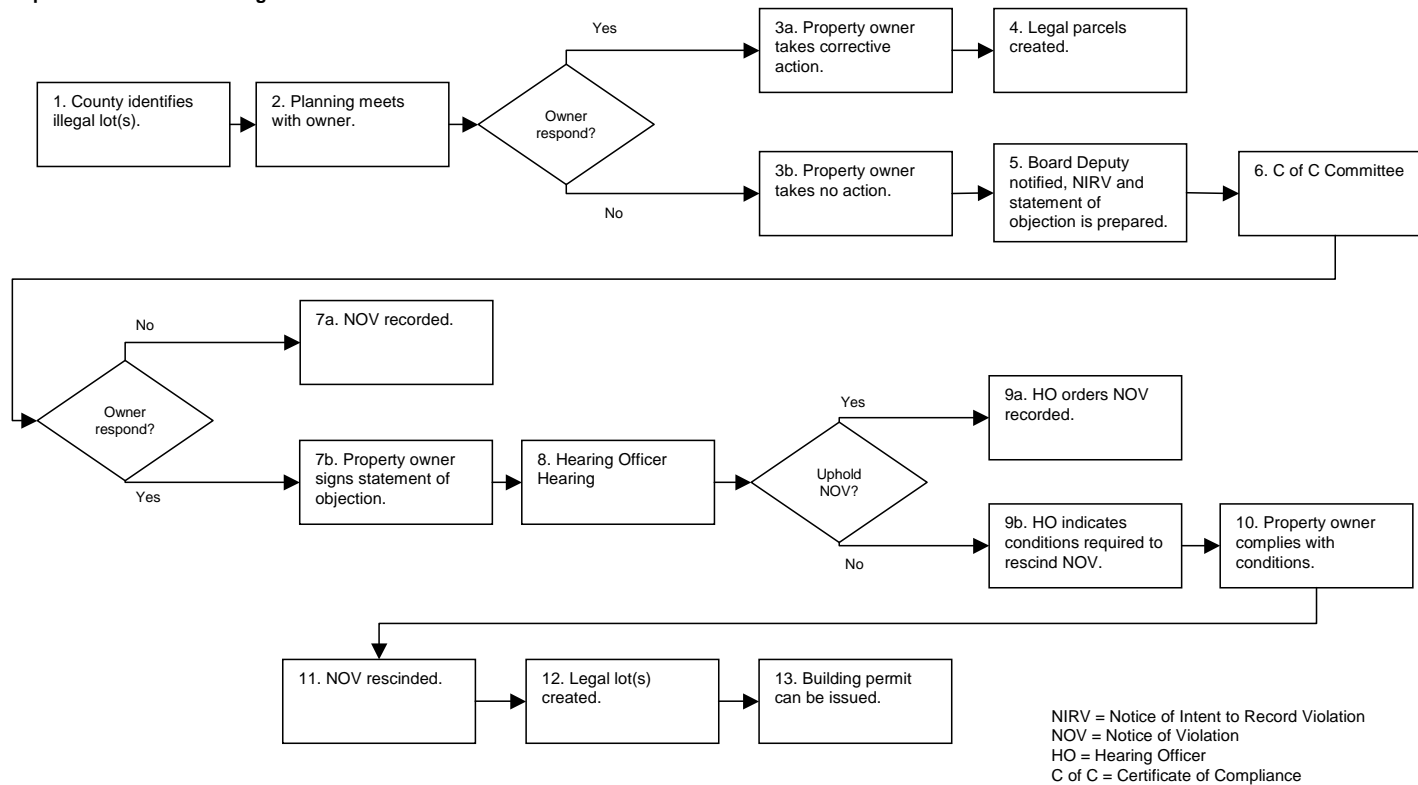
**Figure 20 – Certificate of Compliance Review Process**

Mgmt Audit of LA County Regional Planning  
Map: Certificate of Compliance



**Figure 20 – Illegal Parcel Review Process**

**Mgmt Audit of LA County Regional Planning**  
**Map: Parcel Identified as Illegal**



While DRP and the LDRE Section's mission is to identify and take appropriate corrective actions regarding illegally issued C of Cs, it should be recognized that there is a backlog of applications without this problem. For many applicants, the C of C is required to obtain a building permit. Financial institutions can also require the certificates as a condition of lending. Processing delays can have significant impacts on property owners.

Although the Certificate of Compliance is part of State law, cities and counties have some flexibility in how they administer them. Some jurisdictions trust the property owner to submit the necessary documentation to prove the parcel is legal, while others do the research themselves. Some require Certificates of Compliance for every type of building permit including minor remodeling of existing structures, while others require it only for new construction. Some allow building permits to be issued with simple proof of a legal lot (i.e. for any deed recorded before February 1972 that lacks a certificate). Some jurisdictions will issue certificates that have conditions, while others will not issue conditional certificates.

Los Angeles County procedures demonstrate a cautious and conservative approach but one that may be appropriate considering their previous problems. To expedite the process without taking on undue risk, the Department of Public Works and DRP should consider not requiring a Certificate of Compliance for any property that already has a legally built structure based on the assumption that the lot was deemed legal at some point in the past.

**Recommendation E-21: Use contract title investigators for processing new certificates**

While the chain-of-ownership searches for questionable Certificates of Compliance have been completed, some of the contract title investigators should be retained and directed to complete the chain-of-ownership searches for any existing or new requests until there is no longer a backlog.

**Recommendation E-22: Limit requirements for certificates of compliance**

The County should amend the subdivision and/or the Zoning Ordinance to implement a two-tiered review and fee for certificates of compliance. A lower fee and review would be used if the parcel in question has a legally built structure and the applicant is applying for a relatively minor project such as a room addition.

## Other Issues

### Inconsistent Quality of Staff Reports, Conditions and Findings

County Counsel has raised concerns about the quality of staff reports, conditions and findings that are sent to the Planning Commission. Standard formats for the conditions and findings need to be agreed upon, boilerplate wording for conditions utilized whenever possible and an identification of what type of special conditions can be proposed successfully and which types cause problems. This information should be available to staff in a procedure manual. In addition, supervisors need to monitor and check for consistency in staff reports, conditions and findings.

Presently, there are no up-to-date policy or procedure handbooks in Current Planning. For example, the Impact Analysis Section uses an Environmental Procedure and Guideline document dating from 1987. Although various documents have been developed in the past, none of the other sections are utilizing anything at this time. Policy and procedure handbooks assist staff in implementing the ordinances and regulations consistently. With the ongoing retirement of longtime employees, the institutional memory of the agency is being lost, making the development of such a handbook all the more important.

**Recommendation E-23: Develop a policy/procedure handbook**

The Current Planning Division should develop a policy/procedure handbook for each section. This handbook should be updated regularly. In light of the impending retirements among the professional staff, this project should be given priority in order to preserve the institutional memory of the organization.

**Number and Status of Incomplete Cases**

DRP has an unknown number of projects that are dormant (e.g., developer ran out of money or sold the project, etc.). Although there has been no action for perhaps years, the property owner has the right to reactivate the project at any time. No one seems to know how many incomplete cases exist in Current Planning. There is no accurate computer record indicating the status of all the cases or how long the cases have been pending. The necessary data in order to provide such reports frequently is not entered into CTRK. This information is essential to manage caseloads and determine staffing requirements.

**Recommendation E-24: Purge inactive cases**

Current Planning should adopt a policy to handle inactive case files. The Zoning Ordinance should be amended to administratively deem an application dead after one year, if there has been no activity on the case and there is no reasonable justification for the inaction on behalf of the applicant.

**Documentation of Conditions**

Conditions are drawn up by staff from other County agencies as well as DRP planners. The task of the DRP planners is to consolidate these conditions in such a way that the applicant can interpret them and comply with them, and so that the various inspectors from DRP and other agencies can interpret them and inspect compliance. Too often conditions from the various agencies are documented in various formats, stapled together or otherwise assembled in a slipshod manner. This makes it difficult for applicants and inspectors to get the whole picture of what must be done at the site.

**Recommendation E-25: Improve documentation of conditions**

The conditions of approval from all sections, departments and agencies should be contained in a single document and should not be referenced as an attachment. Other agencies should be strongly encouraged to submit their conditions in time for them to be included with DRP's report. In order to facilitate the preparation of the conditions, other agencies should

e-mail their conditions in a format that can be merged with DRP's conditions. When a condition is added or changed at the public hearing, the written conditions should be appropriately modified prior to being given to the applicant.

## Section F – Inspections and Enforcement

DRP has a large zoning enforcement function housed within the Land Use Regulation Division. The enforcement units comprise the single largest organizational unit within DRP with 23 staffed positions.

County policy makers have a high degree of interest in zoning code enforcement. This interest stems from an emphasis on neighborhood revitalization and being responsive to neighborhood concerns regarding community aesthetics. Zoning enforcement is also seen as a crime suppression strategy with the argument that criminal activity takes a foothold in areas where social order breaks down and blight takes hold. The so-called “broken window” theory states that by vigorously enforcing laws that address aesthetics (e.g., zoning, graffiti) it becomes much tougher for criminal activity to start.

Historically, zoning enforcement was seen as the backwater of DRP, not as desirable as work in busier areas such as advance and current planning. Staff assigned to zoning enforcement saw it as a sign of disfavor or punishment. This stigma has changed over the last few years with zoning enforcement now seen as a politically popular and important function.<sup>19</sup> Zoning enforcement is also the traditional training ground for DRP. Many new hires work in enforcement for 2 to 3 years to learn how to use the Zoning Ordinance. Spanish-speaking staff frequently spend more time in zoning enforcement due to their ability to work with violators in the many Spanish-speaking areas of the County.

Code enforcement is undertaken by other agencies in County government besides DRP:

- The Sheriff enforces business licensing laws,
- The Department of Public Works (DPW) enforces laws on building and safety, grading and streets,
- Environmental Health enforces laws on food preparation and wastewater systems, and
- County Fire agencies enforce laws on fire prevention and fire suppression.

These agencies combine forces to coordinate enforcement activities. In recent years, DRP staff have joined up with other agencies on special teams for example Nuisance Abatement Teams (NAT) that focus on selected neighborhoods. These teams are assigned to do reactive and proactive enforcement in selected communities and neighborhoods.

Other than these targeted enforcement efforts, most enforcement is reactive in nature based on complaints received from residents or referrals from other agencies. Typical violations include storing inoperative vehicles, keeping junk or garbage within view of other residents, illegal storage of mobile homes or recreational vehicles, illegal business signs or converting a garage into a living unit. Others collect older cars for parts or to repair them

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<sup>19</sup> Despite a new focus on zoning enforcement, anecdotal evidence suggests that lack of visibility, promotion opportunities and job content is still an issue among zoning enforcement staff. See Section G for additional information.

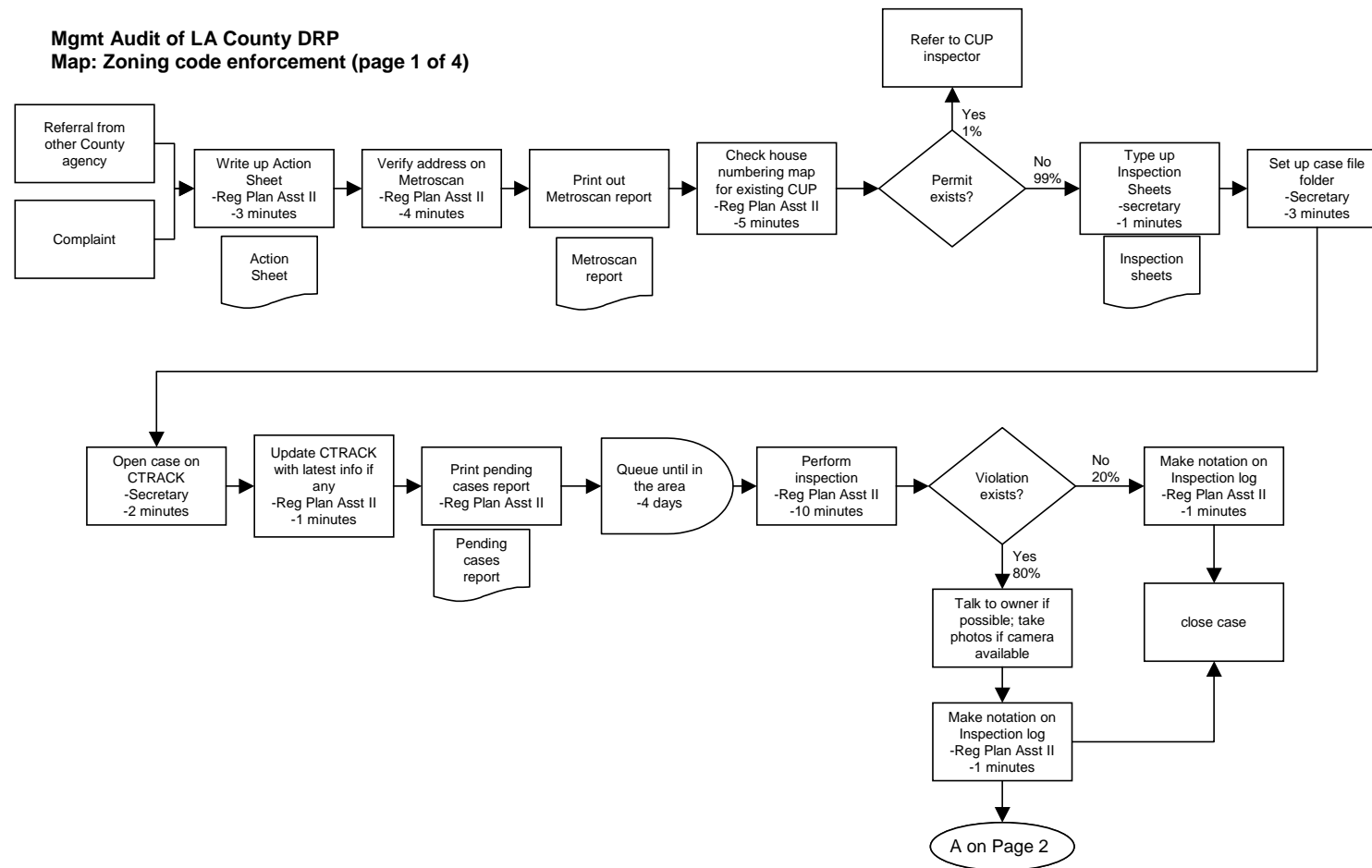
and end up leaving them on the curb or the lawn for months at a time. These seemingly innocuous problems become a real headache for nearby residents, can impact property values and create an image of a blighted neighborhood. The goal of zoning enforcement, in conjunction with other County agencies, is to aggressively combat these problems.

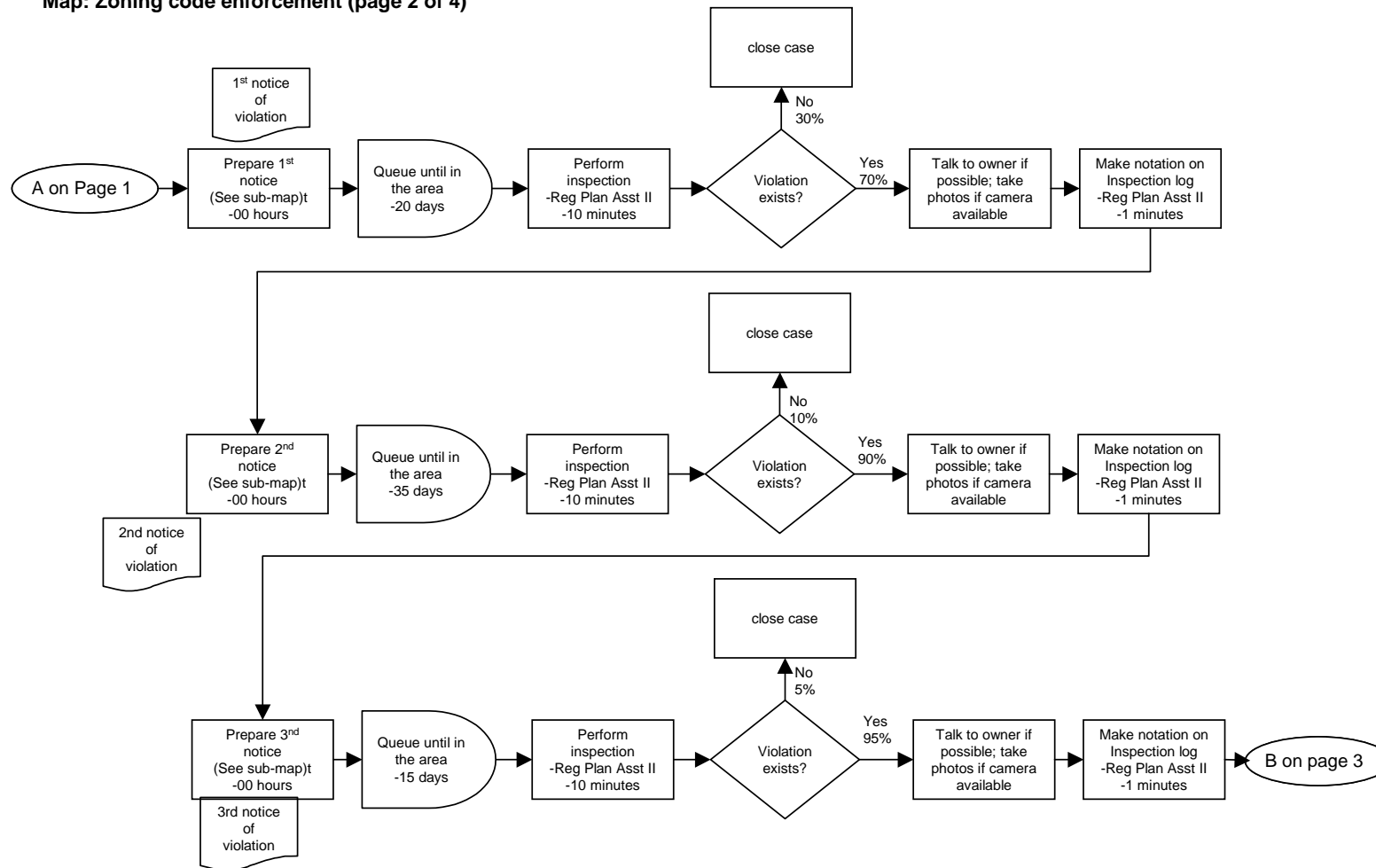
Zoning enforcement agents also conduct community outreach, visiting with community groups to gather input or explain how the County can help with neighborhood enhancement.

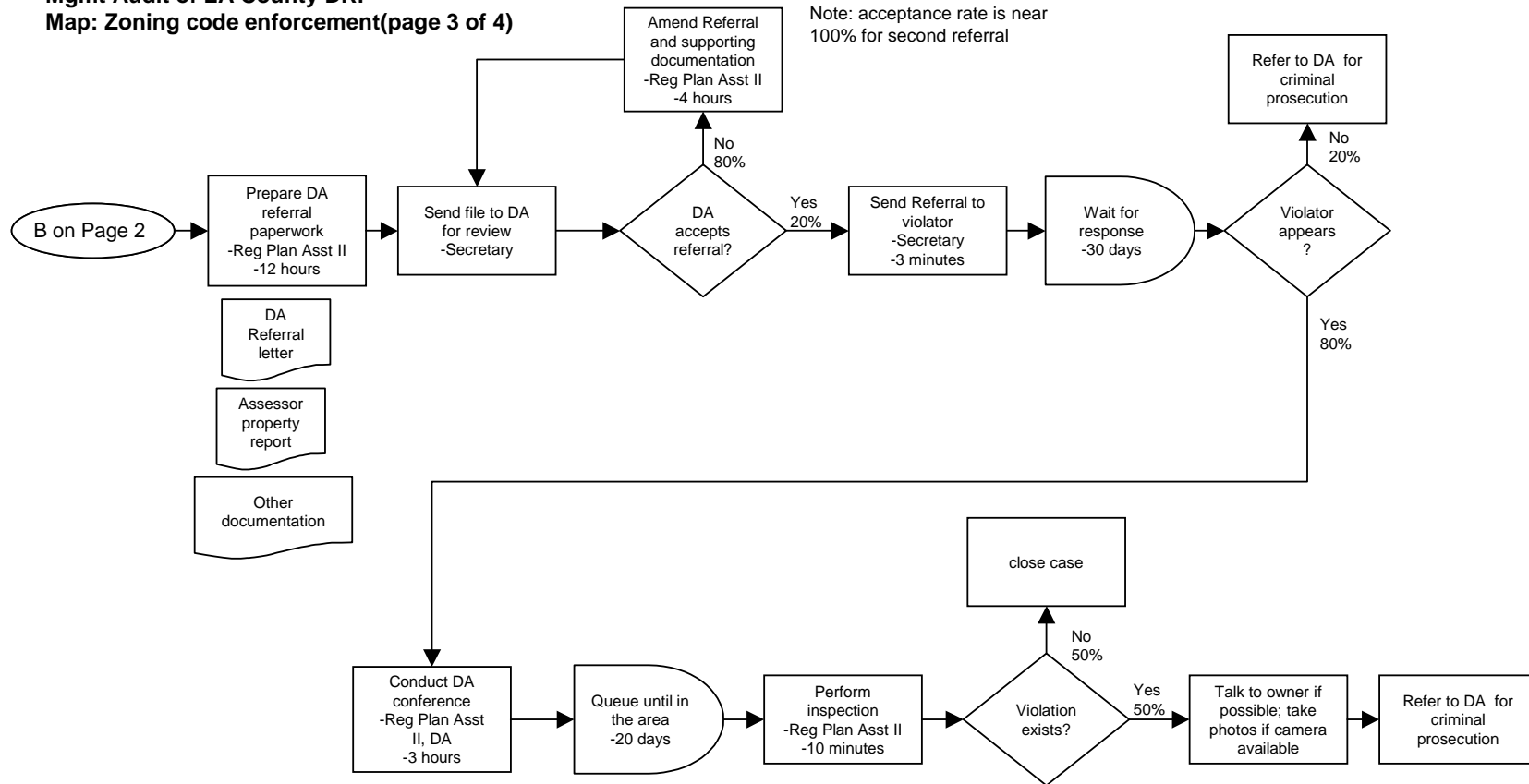
The Department is currently handling approximately 3,300 enforcement actions with 21 enforcement agents or about 157 violations per agent.

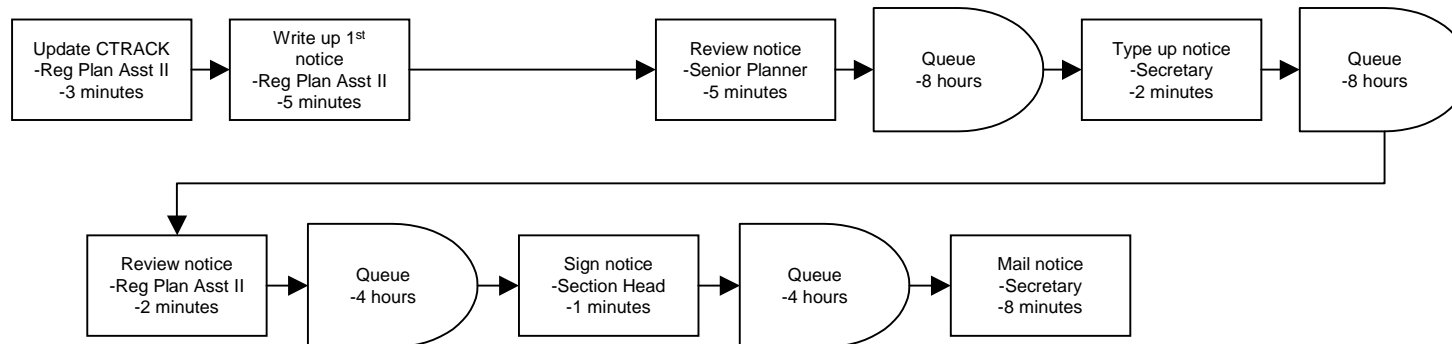
### Enforcement Processes

The enforcement process used by DRP relies heavily on voluntary compliance. Seeking to avoid being seen as heavy-handed, DRP staff go through a deliberative, multi-step process to achieve compliance with the Zoning Ordinance. The process is illustrated on the following pages.

**Figure 21 – Zoning enforcement process**

**Figure 21 – Zoning enforcement process****Mgmt Audit of LA County DRP****Map: Zoning code enforcement (page 2 of 4)**

**Figure 21 – Zoning enforcement process****Mgmt Audit of LA County DRP****Map: Zoning code enforcement(page 3 of 4)**

**Figure 21 – Zoning enforcement process****Mgmt Audit of LA County DRP****Map: Zoning code enforcement (page 4 of 4) (Notice preparation sub-map)**

## **Staff Productivity**

As seen in the process maps, zoning enforcement is highly labor intensive. It can require multiple site visits to document the condition of a violation. For serial violators or noncompliant violators the process can stretch over several years. On top of the site visits, the process also requires laborious preparation of personally addressed violation notices, preparation of handwritten site visit notes, maintenance of the CTRK system, DRP's case tracking system, and commuting between the field and the downtown office.

DRP zoning enforcement staff have a few technical tools available but not enough to ensure that all staff are adequately equipped when working at field locations. The 21 staffpersons have at their disposal seven notebook computers and eight digital cameras and some 35 mm cameras. They also have a limited number of desktop computers. They have no County-issued cell phones or vehicles. Agents use their own vehicles to cover the field and some use their own cameras or cell phones. Agents also do not have easy access to four-wheel drive vehicles. This can pose problems in the outlying areas where dirt and sand roads must be navigated to reach sites.

Enforcement staff (as well as most other DRP staff) also lack private voicemail boxes. Violators or other interested parties who call reach a receptionist who takes messages. This limits the ability of violators to leave detailed messages or contact agents while they are in the field.

The infrastructure and technology available to the enforcement staff presents a dichotomy: agents need to be out in the field where the violations and violators are located, yet must also be in the office to perform data entry tasks or return phone calls. This situation is exacerbated because most unincorporated areas in the County are far from downtown. Only East Los Angeles is within five miles of the downtown office. Some areas require an hour of driving time to reach.

The combination of commutes between the Hall of Records and the field and the distance from the parking lot means that agents are losing valuable working hours and productivity to commuting. The provision of these tools could enhance productivity.

### **Recommendation F-1: Implement productivity-enhancing tools and practices**

DRP should implement the following productivity-enhancing tools and practices:

- DRP should purchase and deploy more notebook PCs or PDAs and digital cameras. It should be noted that the KIVA system "remote inspector" function works with both PDAs and notebook PCs. DRP should evaluate the feasibility of both devices and select the one that is most compatible with KIVA and DRP processes. DRP should also phase out the use of 35 mm cameras,
- Purchase several handheld Geographic Positioning System (GPS) units for locating properties in remote areas,
- Private voicemail for all DRP staff in addition to zoning enforcement agents, and
- Provide County cellular phones to field staff to keep in touch with the home office, other County staff and to discuss cases with violators.

## Enforcement Methods

The process map also shows that the County relies on three methods to achieve compliance with the Zoning Ordinance:

1. Persuasive discussions from enforcement agents,
2. The threat of fines, and
3. The threat of criminal prosecution.

Persuasion is very effective and results in most cases being closed within a few months. The DRP enforcement staff deserves credit for their reasoned, persuasive, professional approach to dealing with violators. In the minority of cases when persuasion doesn't work, the agency relies on fines and criminal prosecution.

Fines and prosecution are not as effective as they could be. The Department makes minimal effort to collect noncompliance fees. The agency also does not track or account for outstanding fines nor could the agency provide a reliable estimate. Noncompliant property owners simply receive another letter rather than collection efforts.

Criminal prosecution could be a powerful tool if it was utilized more. Many perpetual violators clean up their act once presented with the threat of criminal indictment. The Department must rely on the County District Attorney to file criminal complaints against violators. State law reserves for the District Attorney the power to prosecute individuals and businesses in unincorporated areas. In FY 01-02, approximately 50 cases out of a total of 3,300 were referred to the District Attorney.

The District Attorney, assisted by the enforcement agent, also conducts conferences with recalcitrant violators. At these conferences, called "office conferences," violators are apprised of the serious nature of their recalcitrance and are encouraged to comply. Office conferences are a cost-effective way to achieve compliance before the more expensive process of criminal prosecution begins.

The District Attorney assigns two attorneys to prosecution of zoning violations. These attorneys also handle cases from other County agencies and contract cities. These attorneys adopt a conservative approach to filing cases, demanding that prosecutorial standards be followed in documenting cases prior to filing complaints. These standards are intended to reduce the risk of prosecuting the wrong people or prosecuting where there was no crime, and mistakes that expose the County to liability. A common standard that poses dilemmas for enforcement is the requirement that agents present violation notices directly to property owners, not just tenants. This can become difficult when tenants are involved, property is held by trusts or corporations or owners are out-of-state as is often the case.

In addition to the requirement that the true owners be noticed, the complexity of the Zoning Ordinance also makes it difficult to prosecute zoning violations. The complexity makes it difficult to build a case and make it supportable before a jury in the unlikely event the case went to trial.

Prosecutors also have a bias toward evaluating cases based on the ability to win a trial or interest a judge in hearing the case. This raises the bar for most criminal referrals brought

to the District Attorney, not just for zoning violations. Prosecutorial standards can also be used as a tool for controlling caseload. By preserving scarce prosecutorial time for the more egregious or well-documented cases, prosecutors can ensure that they are maximizing their and the court's time.

On a strategic level, compliance efforts are based on two tracks: voluntary compliance or the threat of criminal prosecution, fines or loss of liberty with nothing in between those poles. DRP may want to amend their ordinance to allow for a third track that applies more pressure than the Notice of Violation (NOV) but yet does not require the high standards of evidence and impeccable procedures of the criminal justice system.

**Recommendation F-2: Improve collection efforts for noncompliance fees**

DRP should consider contracting with a collection agency to collect outstanding noncompliance fees. DRP should also track and account for the outstanding amounts.

**Recommendation F-3: Establish a Special Remedies program for recalcitrant violators**

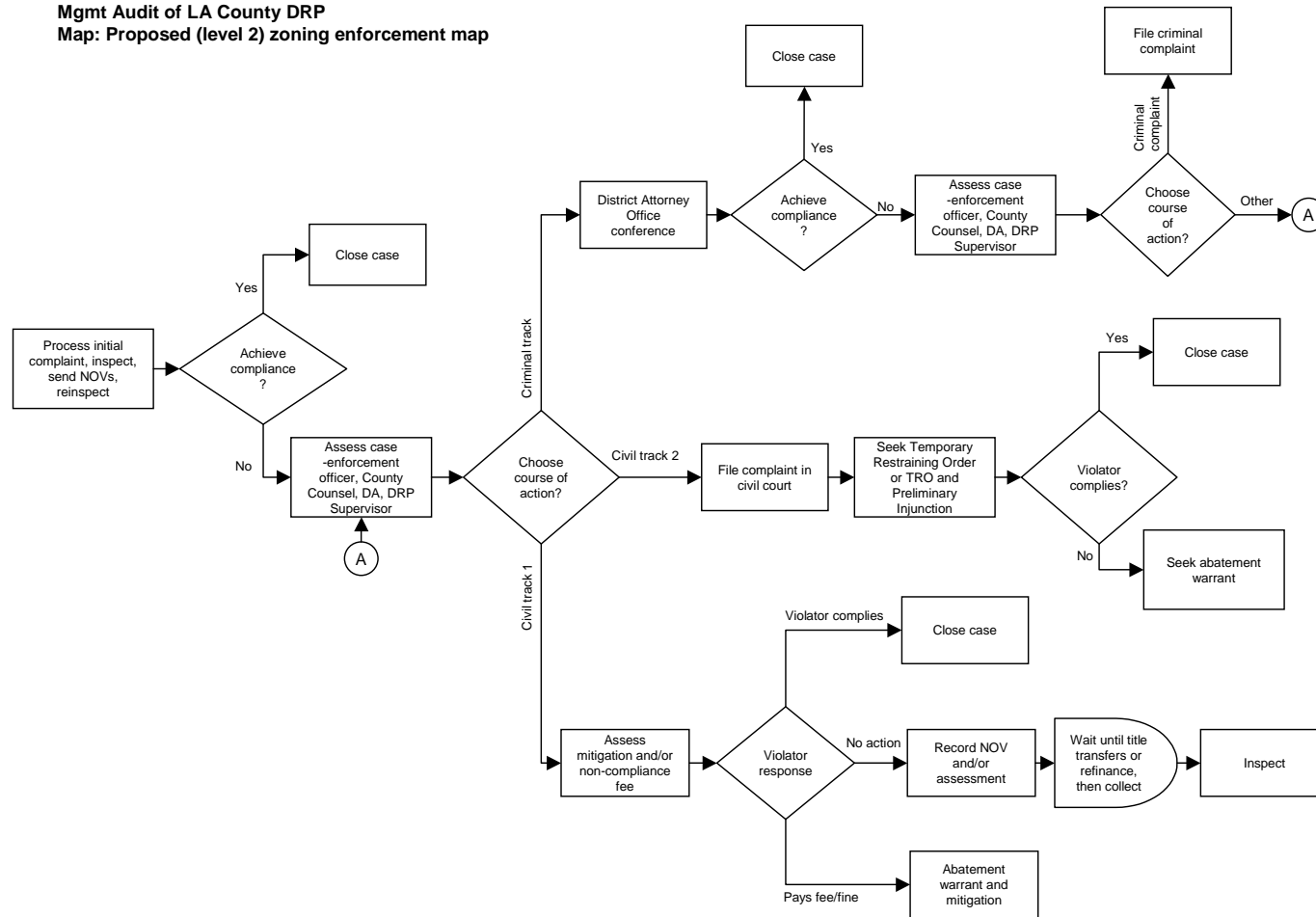
DRP should establish a cross-agency program for addressing violations that cannot be resolved within six months. The program should include these elements:

- A Memorandum of Understanding among DRP, Public Works, Environmental Health, Fire, County Counsel, Sheriff, District Attorney and the CAO,
- A mechanism for assembling cross-agency teams periodically to address the worst or most recalcitrant offenders,
- Assign these cases to a special unit comprised of former law enforcement personnel (see Recommendation F-4),
- Record violations and/or administrative judgments against property title to encourage compliance for less-than-critical violators,
- Implement a civil track using injunctions and restraining orders,
- Consider deputizing County Counsel staff to handle criminal cases and civil matters brought against certain violators, and
- Implement an assessment process for recalcitrant violators where representatives from the District Attorney, DRP and County Counsel review certain cases and select the best enforcement strategy.

Figure 22 on the following page shows the decision points and tracks that would be used in the program.

**Figure 22 – To-Be Zoning Enforcement Map**

Mgmt Audit of LA County DRP  
Map: Proposed (level 2) zoning enforcement map



### Continuity of Enforcement

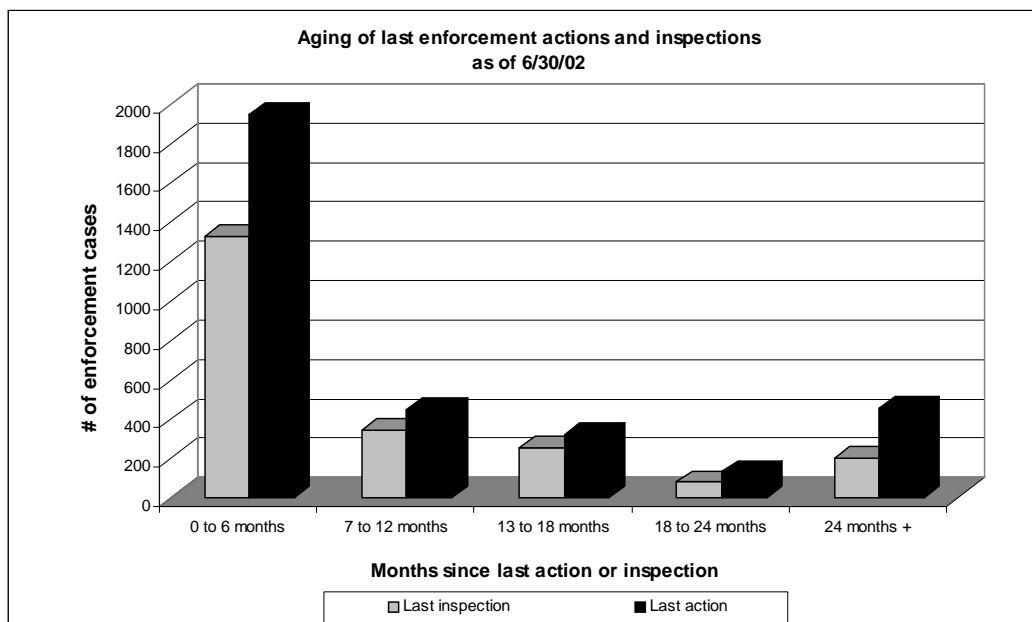
On some cases, persuasion and threats of criminal prosecution are to no avail. This frequently happens when the violation is not pursued through the criminal justice system for whatever reason. These cases are kept on the books and revisited periodically through follow-up inspections. Some cases are pursued for years. Because many cases are closed and then reopened, CTRK cannot provide reliable data to indicate how many long-term cases are on the system.

Cases that are prone toward long-term noncompliance are those where the violator has invested substantial capital toward some noncompliant land use or is generating income from the land use. A good example is illegal storage of recreational vehicles, a lucrative business and apparently a service in demand.

Because the CTRK system has no capability for automatically identifying and listing cases that need attention, it becomes easy to let cases fall through the cracks. This is a problem when an enforcement agent leaves the Department or gets transferred. It can take weeks or months to hire a new agent, train and assign them to a caseload, and a further period of time before the new agent gets around to reviewing all the cases or inspecting them all to determine the status. As discussed further in Section H, agent turnover is a serious problem in enforcement. Turnover during the past three years has approached 20% annually. This does not count staff leaving enforcement for other jobs within the County or DRP. The net effect is a lack of continuity and experience.

The following chart shows elapsed time since an inspection or some other action (e.g., sending a notice of violation letter) has occurred on open cases.

**Figure 23 – Aging of Last Enforcement Actions or Inspections**



Source: DRP CTRK system

As seen in the chart, the majority of cases have been addressed in the last six months indicating that the enforcement agents make a serious effort to stay on top of cases even when there is a break in assignment. The chart also shows that there are a fair number of cases that have not been inspected in several months. Five hundred thirty seven (537) cases or 16% of the total on CTRK have not been inspected in a year or more. Of these, 204 cases have not been inspected in at least two years. Many of these are old cases that slip through the cracks when agents turn over. Some of them may be in compliance but have not been purged from CTRK.

As mentioned earlier, the CTRK system has no capability to identify overdue cases and assign and schedule inspections or actions. These cases can be identified through queries but this is not an efficient way to stay on top of long-term cases as it relies on operator intervention and requires extensive knowledge of how CTRK works.

#### **Recommendation F-4: Create a special unit to handle long-term cases**

DRP should create a specialized unit of enforcement agents composed of a limited number of retired police officers (e.g., three or four) to handle more difficult and recalcitrant cases requiring more complicated or long-term measures. For example, when a case has been on the books for six months or a year, the case would be transferred to this unit for enforcement. These individuals would work within the context of the special remedies program described in Recommendation F-3.

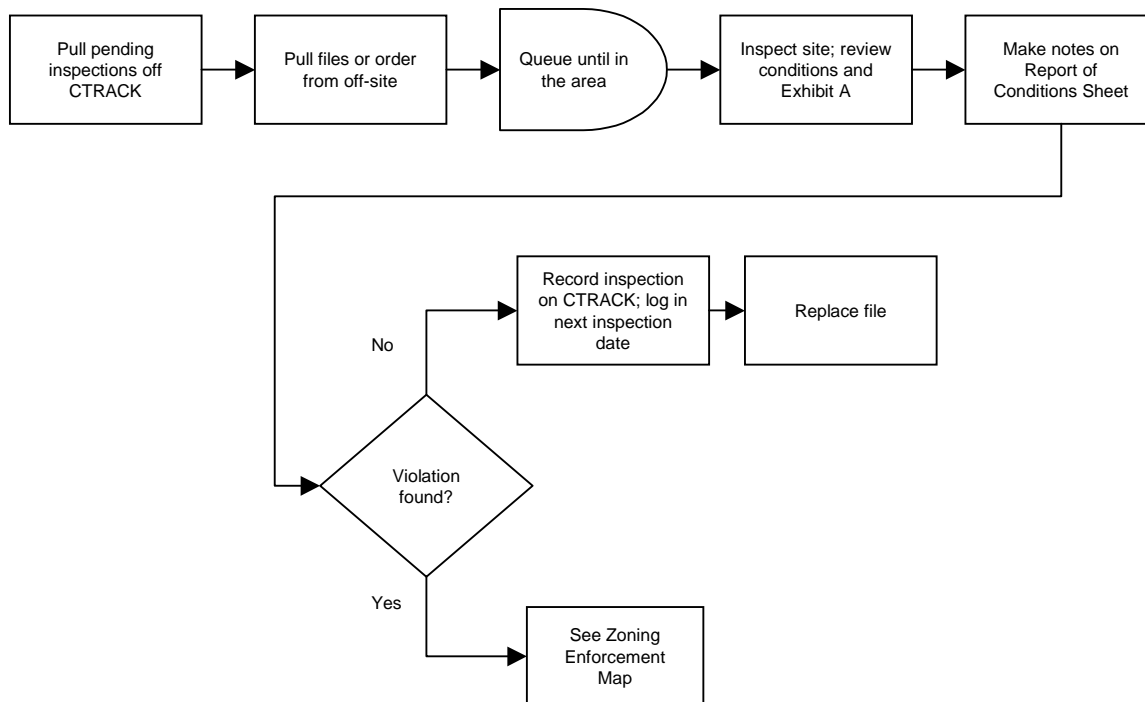
### **Inspection Processes**

The Land Use Regulation Division also inspects properties that have Conditional Use Permits (CUPs). As discussed in Section E, CUPs are discretionary permits that allow property owners to use land in a fashion that is an allowed exception to zoning if certain conditions are met to reduce external impacts. CUPs are inspected on a periodic basis (usually every one to two years) to ensure compliance with the conditions. Failure to abide by conditions can result in a zoning violation case.

DRP currently has at least 3,200 active CUPs listed on the CTRK system. An unknown additional number are active but were granted prior to the advent of CTRK and therefore not on the system. The Department made a conscious decision to not load existing CUPs onto the CTRK system when it was first developed.

CUPs are used for regulating everything from landfills to mobile homes. A typical example of a CUP is a mini-mart that sells liquor. The CUP might regulate the amount of liquor sold, the number of parking spaces, landscaping and the type of signs.

The process map on the following page shows the process used for inspecting CUPs.

**Figure 24 – CUP Inspection Process**

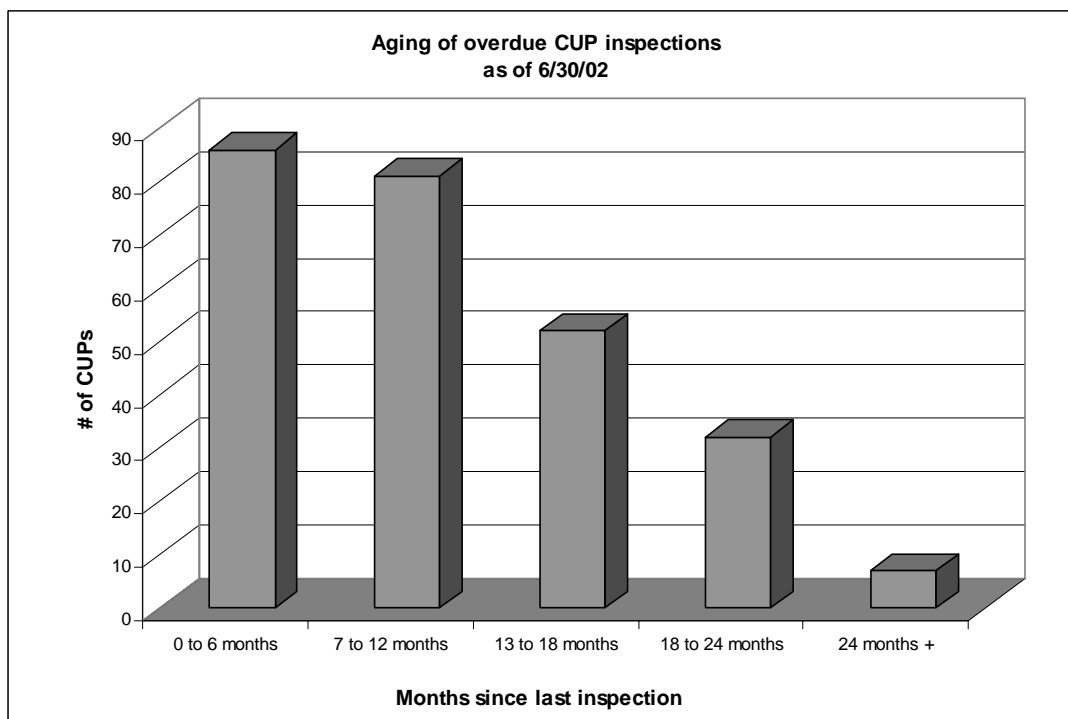
DRP employs two staffpeople dedicated to inspecting CUPs. They operate in a similar fashion as the zoning enforcement officers. They maintain their cases on the CTRK system, spend time out in the field inspecting as well as in the office performing administrative tasks. CUP inspectors are also handicapped by the same productivity issues. They spend a great deal of time in transit between office and field and they lack productivity-enhancing tools such as digital cameras and notebook computers.

They also have some unique challenges. CUP inspectors have to reference written conditions and Exhibit A maps (i.e., map of the site), documents that are contained in the case file. These documents are frequently missing from the case files or different versions are included making it difficult to have something to inspect against. Another challenge is the CTRK system. As mentioned earlier, not all CUPs are listed on CTRK. Since inspectors use the CTRK system to organize inspection activities there is no assurance that these CUPs are checked.

Even with these limitations, the DRP CUP inspection program manages to stay on top of most inspections. As seen in Figure 25 on the following page, out of 3,225 CUPs logged on the CTRK system, only 258 or 8% are overdue for an inspection.<sup>20</sup> The chart shows the overdue inspections by the number of months in arrears. Most are less than 12 months overdue. Many of these overdue inspections are for projects that have not yet been built, yet have an approved CUP on the books.<sup>21</sup>

<sup>20</sup> Most CUPs have a preset inspection schedule (e.g., every six months or year). Overdue inspections are those that have missed the preset date.

<sup>21</sup> A CUP may be issued for a project but for a variety of reasons the project may be delayed or changed. Nevertheless, the CUP stays on the books and inspections are scheduled even though there may be nothing to inspect.

**Figure 25 – Aging of Overdue CUPs****Recommendation F-5: Inspect all overdue CUPs**

DRP should review all CUPs and subdivisions for inspection status. Any overdue CUPs or projects should be programmed for an inspection.

**Recommendation F-6: Address older CUPs**

DRP should add older CUPs onto the CTRK or KIVA system and program inspections if overdue.

## IT Systems Supporting Enforcement/Inspection Processes

CTRK (pronounced C-TRACK) is the DRP case management system used for tracking both current planning and zoning enforcement cases. CTRK is a database management program based on Microsoft Access software. CTRK tracks cases, actions taken, actions to take in the future, location of the violation, and assigned planner. See Section J for more detail on CTRK.

CTRK is not integrated with similar systems used by other County agencies. The Building and Safety Division of the Department of Public Works uses a similar Access-based database system as the one used by DRP (one may be a version of the other). Since many properties have violations that cross agency boundaries, theoretically, and probably in

practice, violations are logged and tracked on duplicate systems. This is certainly the case for violations addressed by the interagency enforcement teams such as the Nuisance Abatement teams.

Another issue for CTRK is the inability to access the system remotely. For zoning enforcement agents and CUP inspectors working out in the field, this obligates them to make the drive into downtown Los Angeles to access CTRK and update their case records, generate reports or run queries. DRP recently experimented with remote-access capability for notebook PCs but this system only works with County-issued notebook PCs which are in short supply and must be shared by staff.

Perhaps the greatest shortcoming of CTRK is the inability of the system to truly manage the data. An effective case tracking system will sift through the open cases and, based on decision logic, provide guidance regarding which cases need urgent attention (e.g., those with overdue inspections or where deadlines for compliance have passed). CTRK can perform these functions but not without significant user intervention and knowledge of the database and how it is organized. CTRK is limited by the underlying Access database management program. Access is a decent database management tool but DRP has outgrown what Access can handle.

Due to these limitations, CTRK is of limited utility as a case tracking system. Indeed, many enforcement agents only use the system sporadically, relying more on paper files or hard copies of CTRK reports to manage their inspections and activities. This also reduces the utility of CTRK as a management tool since much of the data tends to be out-of-date.

Enterprise-wide case tracking and permitting packages have been available for years and are used in many peer jurisdictions. DRP has taken a cautious approach on this, opting to evaluate these packages and their degree of consistency with DRP business processes. Thus far, the changes that would be required to DRP processes have been deemed to be too extensive to warrant the investment. Meanwhile, the Department of Public Works (DPW) has taken the lead and selected the KIVA package produced by Accela Corporation thereby setting the technology standard for DRP and the rest of the County. Accela has submitted a proposal to DRP to conduct a “fit analysis” in order to evaluate ease of implementation but the agency has not yet taken any action.

#### **Recommendation F-7: Implement the KIVA system for case tracking**

The Board of Supervisors should provide supplementary funding and DRP should provide staff support to implement the KIVA system that is currently being implemented by DPW including the code enforcement, current planning, inspection management functions as well as the web-based applications available from KIVA. The County should also encourage deployment of the KIVA system at other County agencies heavily involved in development review and code enforcement such as Environmental Health and Fire. This system will provide key process supports such as:

- Conditions of approval maintenance,
- Clearance checklist to track clearances from multiple agencies,
- Inspection history by type of permit,
- Daily computer-generated priority lists for inspections and complaints,

- Follow-up action lists for outstanding complaints,
- Database of communications sent to applicants and complainants,
- Priority assignments for critical complaints and violations,
- Direct interface with ARCVIEW GIS system to link case history with GIS mapping,
- Tracking of parcel history including permits, violations, ownership, etc.,
- Linking complaint history with outstanding or new permit applications to prevent violators from conducting new projects,
- Website functions such as online permits, complaint data entry and case status, and
- Remote inspector functions such as downloads/uploads from/to handheld devices such as Personal Digital Assistants (PDAs).

The KIVA system will improve inspector productivity by allowing remote access, providing better case management tools such as tickler functions pushing overdue inspections and consolidation of violations that cross agency boundaries. DRP and the County should consider enhancing the existing IT modernization surcharge to fund KIVA

## Interagency Coordination

As mentioned earlier, several County agencies are involved in code enforcement and inspections. Violations have a tendency to cross County organizational boundaries. A classic example is the garage conversion that is a zoning violation (i.e., two dwelling units on an R-1 lot, insufficient parking); a Building and Safety violation (i.e., illegal construction with probable inadequate wiring, plumbing and life safety systems); and possibly an Environmental Health violation (i.e., illegal wastewater system). Other than the Nuisance Abatement Teams that combine inspectors from several agencies, identifying and following up on violations tends to be decentralized and uncoordinated. Each agency sends out inspectors, usually based on complaints received from constituents, to record and address violations of their specific ordinance. Zoning inspectors deal with zoning violations, Building and Safety deals with Building and Safety code violations, and so on. This means that not only are many violations not addressed, but there is also much duplication of effort. Theoretically, three or four inspectors could write up the same property on three or four different visits and send three or four different notices of violation. In practice the agencies coordinate to some extent, but there is no system or process that assures that this happens.

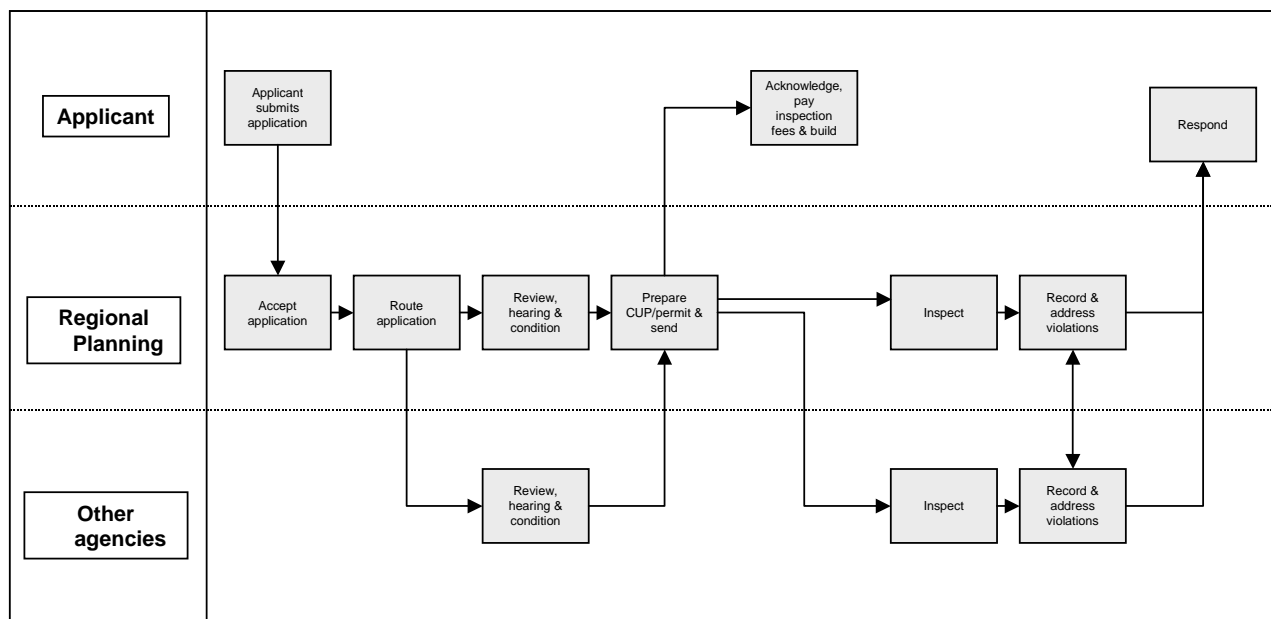
Each agency also has a different set of remedies and legal procedures:

- Building and Safety: Violations are a misdemeanor, agents assess a \$1,000 fine and send a Notice of Violation (NOV). The NOV is recorded and then rescinded upon evidence of compliance. Building and Safety can abate (i.e., send trucks to clean things up) and lien the property to recover costs.
- Zoning: Violations are either a misdemeanor or an infraction, NOVs are sent and noncompliance fees are assessed. Noncompliant CUPs can be revoked although this is extremely rare.
- Health: County can abate the violation and recover costs through civil action.

Each agency having a different ordinance and legal process makes it difficult to consolidate violations and deal with them in a coordinated manner. The District Attorney is also reluctant to accept referrals unless violations are consolidated. Since all of these ordinances are created by the County, theoretically, the Board of Supervisors could amend them to be more uniform and easier to consolidate. This will make violations easier to track and prosecute.

Another significant integration issue for the County deals with all discretionary permits, not just CUPs. With most discretionary permits come conditions of approval, mitigation measures or improvements that must be made to lessen the impacts of development. These conditions are imposed by several County agencies involved in development review: DRP, Public Works, Parks, Fire, and Environmental Health. Conditions are typically consolidated by DRP and then issued to applicants and developers. Figure 26 shows this process graphically:

**Figure 26 – Permit Conditioning and Approval Process**



Verification that conditions have been satisfied, through the inspection process, is the responsibility of each agency that imposed the conditions. In practice, there is virtually no assurance that all conditions imposed by all agencies for a specific project will be inspected. Some agencies have stronger inspection programs than others or more rigorous scheduling and tracking systems. The decentralized nature of the inspection process means that there is little accountability over the process. It is too easy to assume that another agency is checking compliance.

Fragmentation in the process of conditioning development permits and ensuring compliance with those conditions through inspections has created serious breakdowns. During 2002, several conditions associated with a residential project near Pasadena called La Vina were not implemented as agreed by the developer. The County Auditor-Controller investigated this issue and found "deficiencies relating to the development approval and monitoring process, including a lack of departmental collaboration and coordination." This example illustrates the risks of loose controls over the development review process. The La Vina

report recommends several measures that mirror the ideas proposed in this Management Audit including the implementation of a Countywide case tracking system.

The system is so uncoordinated that cases have been documented where permits are granted on properties with outstanding code violations, thereby rewarding violators for noncompliance. If the County is serious about code enforcement and enforcing conditions of approval, which it seems to be at a policy level, the underlying procedures and systems need to be upgraded to ensure that policy becomes practice on a consistent basis.

**Recommendation F-8: Amend ordinances so that code violation procedures and compliance tools are consistent across agencies**

County Counsel, with assistance from DPW, DRP, Fire and Environmental Health should amend the zoning, building and safety, fire and public health ordinances so that the fines, penalties and enforcement procedures are consistent across agencies. Ordinances should also facilitate consolidation of violations and mitigation efforts.

**Recommendation F-9: Implement steps to strengthen condition compliance**

DRP, in conjunction with DPW and County Counsel should strengthen the condition compliance program by:

- Recording CUP conditions and Affidavits of Acceptance with the County Recorder to notify subsequent property owners of requirements,
- Requiring bonding or deposit of funds for conditions involving public improvements or environmental protection measures on more complex projects. Bonding could be combined with the current DPW bonding program,
- Including null and void clauses on all CUPs and maps. The clause would be triggered if a signed Affidavit of Acceptance and inspection fees are not submitted. The property would then be scheduled for an inspection to assess possible noncompliance and a Notice of Violation and/or fee,
- Requiring a signed mitigation monitoring agreement and payment of inspection fees for subdivision maps as well as CUPs. Agreements should be recorded with the County Recorder so that subsequent owners are notified, and
- Requiring more frequent inspections on properties with a history of violations.

# Section G – Performance Measurement

Clear and comprehensive statements of agency goals are key to developing good performance measures because the goals drive what should get measured. A performance measure is a quantitative indicator that links to a goal and enables measurement of the degree of accomplishment of that goal. If the goal is the intended destination, think of a performance measure as an odometer reading that indicates what milepost has been reached.

There are many good reasons for public organizations to measure performance. If done well, performance measurement can achieve many benefits like those identified below:

- **Clarify long-term objectives.** Performance measurement involves comparing actual performance against benchmarks and setting new targets for program performance.
- **Provide accountability.** Providing accountability to the public and higher levels of authority is a way to communicate success, or lack thereof, to constituencies with an interest in the program. It helps demonstrate what works well and what does not.
- **Stimulate public interest.** If measures of performance are communicated to the public, many citizens will feel that they have a better understanding how government services are doing, and citizens may become more involved as a consequence.
- **Foster dialogue to clarify program objectives.** Thinking about performance measures causes policy-makers, managers, and staff to ask, “Why are we doing this?” and to sometimes challenge traditional methods and assumptions.
- **Help motivate employees.** Most people like to be part of a winning team. But one can tell that the team is winning only if someone is accurately keeping score. Even if the results are not as good as hoped (the team is behind in the score), the team members are likely to be more strongly motivated when they know where improvement is needed than if this is unclear. “*What gets measured is what gets done*” is perhaps the most often repeated mantra of performance measurement.
- **Focus policy discussion on results.** Policy discussions (for example, in legislative committees) are constrained by the type, quality and amount of information available. Where good information on program performance is lacking, there is an unfortunate tendency for these discussions to rely on speculation and anecdotes and to orient toward process issues and implementation details. Good performance measures can lift the considerations of policy-makers to larger questions of program design, outcomes and efficiency.
- **Identify opportunities for improvement.** If performance shortfalls are identified early, the agency can take timely corrective actions and evaluate the effect of the actions.
- **Guide management in allocating resources.** Good performance measurement can provide valuable input for budget and planning processes. It can assist policy-makers and managers to judge where they may find the best, or at least better, returns on investment.
- **Build stakeholder support.** It is a legitimate use of performance measures for managers to use them to develop program understanding among key stakeholders and constituencies, with the aim sustaining or increasing the funding for a program.

- **Assure compliance with requirements.** Many state and local governments now require their departments and agencies to prepare performance measures. The requirements may originate in statutes, ordinances, rules or executive directives. Often, performance measures are required in budget submissions.

A set of criteria for an effective set of measures would include:

- **Few in number.** The measurement set should provide just enough information to indicate strategic or operational problems or gauge performance, not determine in minute detail where the problems lay. Many private corporations get by with fewer than ten performance measures.
- **Comprehensive.** The measures should include at least one input, output, effectiveness and efficiency measure for each major element or process of the organization.
- **Credible.** The organization's employees and key stakeholders should have faith that the measurement system produces sufficiently accurate (not perfect) numbers and that the numbers measure the right things.
- **Easy to administer.** Ideally, automated systems can generate the needed data with a minimum of human intervention.
- **Tied to the organization's strategy.** Measures should help support the achievement of the strategy and the associated tactical or business plans. This should also ensure that the measures are important to the key stakeholders.

Our procedure for evaluating the performance measurement system at the DRP included this five-step process:

1. A survey of measures and benchmarks used by the DRP including those used in annual budget messages and in MAP goals,
2. Completing an inventory of all DRP measures and categorizing based on the type of measure,
3. Identification of gaps in the measurement system where a program may lack a certain type of measure,
4. Two workshops with DRP managers to evaluate the existing set of measures and select a concise, complete set of measures, and
5. Documentation of the selected measures.

### Measures Currently Used by DRP

The DRP currently collects data and reports performance using measures in three different forms:

1. Part of the annual Target Budget Request. Measures are presented for the various program areas using input, output/workload, efficiency and effectiveness/outcome measures.
2. Included in the MAP goals for division administrators.
3. Provisional measures were developed with the assistance of a consultant. More than 90 discrete measures were identified by the working group, a number too large to feasibly implement. Called Key Performance Indicators or KPIs, these measures are currently being evaluated for their usefulness to the agency.

All of the measures currently in use total more than 100 discrete measures. This number of measures is a significant administrative burden for an agency unless the information systems can accurately and easily compile the necessary numbers and statistics with minimal human intervention. The DRP, however, does not have a system that can easily generate the necessary data. Attempting to implement such a comprehensive set of measures without good systems support can breed dissatisfaction with the whole concept of performance measurement.

Another issue with the current set of measures is comparative overweighting and underweighting of measures among the programs. The Current Planning Division, for example, has 15 efficiency measures yet no outcome or quality measures. The Advance Planning Division has just five measures in total. This lack of balance can impair the ability to gain an overall perspective on agency performance. A complete listing of current measures is found in Appendix 2.

Working with the key executives of the DRP, we evaluated the current measures, suggested new ones to consider and worked down to a preliminary set that should work well for the agency. These measures are included in Recommendation G-1.

## Recommendation

### **Recommendation G-1: Implement the performance measures identified during the June 25, 2002 workshop.**

The DRP should replace the current measures used in the annual budget requests, the MAP goals and the KPIs with the measures selected during the workshop.

These measures are listed in Figure 27 on the following page.

Figure 27 - Recommendation G-1: Performance Measurement Matrix

	Advance Planning	Current Planning	Land Use Regulation	Fiscal/Technical
<b>Workload/inputs</b>		<ul style="list-style-type: none"> <li># of plot plans received</li> <li># of CUP applications received</li> <li># of environmental assessments received</li> </ul>	<ul style="list-style-type: none"> <li># of cases opened</li> <li># of inspections</li> </ul>	<ul style="list-style-type: none"> <li>Budget (NCC and expected revenue)</li> <li># of GIS requests</li> </ul>
<b>Outputs</b>	<ul style="list-style-type: none"> <li># of CSDs completed or updated</li> <li># of community/area plans completed or updated</li> <li># of ordinances completed for hearing</li> <li># of community outreach meetings conducted</li> </ul>	<ul style="list-style-type: none"> <li># of plot plans reviewed</li> <li># of CUP applications set for public hearing</li> </ul>	<ul style="list-style-type: none"> <li># of cases closed</li> </ul>	<ul style="list-style-type: none"> <li># of training hours</li> <li>Actual expenditures</li> <li>Actual revenue</li> <li>GIS products delivered</li> </ul>
<b>Outcomes/quality</b>	<ul style="list-style-type: none"> <li># of communities covered by community or area plans</li> </ul>		<ul style="list-style-type: none"> <li>% of outstanding cases where last action is older than 16 months</li> </ul>	<ul style="list-style-type: none"> <li># of training hours per staffperson</li> <li>Actual revenue as a % of budget</li> <li>Actual agency expenditures as % of budget</li> </ul>
<b>Efficiency</b>		<ul style="list-style-type: none"> <li>% of plot plans completed within two weeks</li> <li>% of CUP approvals inspected after one year</li> <li>% of environmental initial studies completed within four weeks</li> <li>% of land divisions scheduled for committee within 30 days</li> <li>% of minor permits handled administratively (not appealed)</li> </ul>	<ul style="list-style-type: none"> <li>% of new enforcement actions inspected within 30 days</li> </ul>	<ul style="list-style-type: none"> <li>% of BOS requests (five day letters, e-mails, etc.) responded to within ten days</li> <li>Hours of overtime used by section</li> <li>% of invoices paid within 30 days</li> </ul>
<b>Accessibility</b>		<ul style="list-style-type: none"> <li>Mean wait time at LDCC counter</li> <li>Mean hold time on LDCC ACD</li> </ul>		

# Section H – Succession and Human Resource Development

Regional Planning is predominately a professional department. Of the 125 budgeted positions, two-thirds (66 percent) are planner classifications requiring a bachelor's degree as a minimum qualification. Positions are also distinguished by the long learning curve associated with planning. It can take years to develop the necessary skills to prepare complicated advance planning documents, conduct community outreach, or support the Planning Commission.

Staffing at the DRP was particularly hard hit during the County's financial difficulties in the early 1990s. Agency staffing was reduced from approximately 200 to fewer than 90. The agency did not hire in appreciable numbers again until the late 1990s. As discussed further in this section, this legacy will have repercussions for years. DRP has been successful in recent years recruiting new planners and rebuilding the Department; DRP has a "steady pipeline" of recruits from urban planning schools at UCLA and other universities in the Southern California area.

The Human Resources/Administrative Services section consists of five budgeted and filled positions within the Technical and Fiscal Services Division. The HR section head is relatively new to DRP, having been with the Department since December 2001. Prior to this, HR duties were handled by a series of other personnel staff. The section includes responsibility for:

- Payroll,
- Personnel recruitment and promotional exams,
- Training,
- Procurement, and
- Administrative functions such as mailroom/messenger services, parking, and vehicles.

## Staff Turnover

Department turnover was analyzed for the five-year period of 1997-2002 and is shown in the table below. This data showed that of the Department's 125 employees, 44 resigned, retired or were terminated in the five years between FY 97-98 and April 2002. These figures indicate an annual Department-wide turnover rate of roughly 8%. This agency-wide turnover rate is not extraordinary.

**Figure 28 – Turnover Statistics**

Organizational Unit	Total Budgeted (2002-2003 Proposed Budget)	Total Filled as of 3/31/02	Departures (1997-2002)	Annual Turnover (five year average)
Executive Office	5	5	1	4%
Current Planning	27	27	12	9%
Land Use Regulation	37	38	20	11%
Advance Planning	26	18	8	9%
Technical and Fiscal Services	30	23	4	3%
Agency-wide	125	111	44	8%

A closer look at the components of the turnover rate reveal some areas of concern. In Land Use Regulation, the turnover rate was 11% for the five-year period. However, almost all of the turnover in the Zoning Enforcement Sections (12 of the 13 departures) has been within the past three years (FY 99-00 to current), for a significantly higher and excessive annual rate of 18%.

A review of the dates of hire and dates of departure for those persons who left DRP in the past five years revealed that the Department is experiencing serious difficulty in retaining entry-level planners. Of the 34 planners who departed in the past five years, 23 (68%) were new employees who had been with DRP three years or less. Specifically:

- Of the 12 departures in Zoning Enforcement within the past three years, two-thirds (nine) were new planners who had been with DRP three years or less.
- All three departures from Zoning Permits were new planners who were with DRP three years or less.

Given the high number of impending retirements in the near future, the agency needs to be in a position of building skills, tenure and knowledge at an aggressive rate. This is hindered by the high turnover rate, particularly among young planners. DRP does not collect exit interview data, thereby missing an opportunity to systematically analyze and address turnover. Anecdotal information suggests that a key factor in some exits is the lack of challenging job content in zoning code enforcement. Related to this is the perceived lack of

promotional opportunities in other areas of the agency. Many young planning hires perceive code enforcement as “paying their dues” before moving up into planning positions. Many exit prior to realizing these promotion opportunities. The agency should address job content and recruiting issues in this area as part of a strategy of reducing turnover, improving continuity in code enforcement and expanding the pool of experienced planners.

#### **Recommendation H-1: Enhance career path for new DRP hires**

DRP should enhance the job content and career path for new DRP hires by implementing several policies:

- Enforce a strict policy of rotating new hires among zoning enforcement, advance planning and current planning jobs during the first 18 months of their employment. Initial rotations in the zoning enforcement sections should be limited to 6 to 12 months. This can be facilitated by stationing staff in field offices where they can staff public counters during certain days of the week fielding questions and checking simple plot plan applications for zoning consistency (as they do currently) and working closely with more senior community and current planning staff.
- New hires should be assigned a mentor who can expose them to other areas of the office, monitor their rotation schedule, advocate for them and ensure that they are on a track to accumulate experience and knowledge about planning.
- Monitor progress against the Staff Skills Matrix (see Recommendation H-7).
- Manage the progress and career track of each new hire by hiring a true human resource professional to augment the current HR bookkeeping staff (see Recommendation H-8).

#### **Recommendation H-2: Conduct exit interviews**

The Human Resources/Administrative Services Section of DRP should conduct exit interviews with departing employees to determine the reasons for leaving. These interviews should be especially useful to conduct with employees who depart after a relatively short tenure of three years or less.

Interviews with departing employees are often a useful source of information as to underlying issues within an organization. Such exit interviews do not have to be extensive; they can be as brief as a one-page questionnaire with blank spaces in addition to a check-off list of reasons for departure. Having such documentation, though, can assist the Department in addressing issues that impact employee retention.

In addition, it is recommended that the Human Resources/Administrative Services Section routinely maintain a departure list and periodically conduct its own turnover analysis to enable the Department to proactively address problem areas.

## Unfilled Positions

As seen in Figure 29 below, there are several higher-level planning positions vacant in DRP. The highest concentration of these unfilled positions is in the Principal Regional Planning Assistant class. This problem of under-filling vacant positions appears to be a systemic problem exacerbated by the County hiring freeze and has several consequences:

- The agency has more difficulty replacing retiring senior staff and managers especially since many of the unfilled positions are in middle-management ranks,
- This creates the illusion of cost savings at the expense of providing agency services. This is an issue where there are existing backlogs in permit inspections, use permits and other areas of the agency, and
- Keeping positions unfilled reduces promotion opportunities which can negatively impact morale.

**Figure 29 – Vacant positions**

Planning Series Level	Classification	Total Budgeted (2002-03 Proposed Budget)	Total Filled as of 3/31/02	Difference (minus # equals vacancy)
Entry Level	Regional Planning Assistant II	31	32	+1
Second Level	Senior Regional Planning Assistant	13	13	0
Third Level	Principal Regional Planning Assistant	12	7	-5
Fourth Level	Supervising Regional Planner	10	9	-1
	Regional Planner II	10	8	-2
	Totals	76	69	-7

### Recommendation H-3: Fill vacant planning positions

County Human Resources should make exceptions from the current hiring freeze and authorize DRP to fill the vacant and budgeted higher-level planning positions in the Department, either through promotions or outside hires. Currently, the Department has seven unfilled planning positions. These positions could be directed at certain areas with processing backlogs such as permits and inspections.

## Retirements

The consultants analyzed prospective retirements by reviewing DRP staff tenure with the agency and in County employment. The chart below shows the tenure of all DRP staff. As the chart shows, agency-wide tenure demonstrates a “U” shape with large numbers of low-tenure staff (i.e., less than ten years’ experience) and long-tenure staff (i.e., 30+ years). The cohorts in between these two extremes (i.e., between ten and 29 years) are fewer in number in relative terms.

**Figure 30 – Employee Tenure**

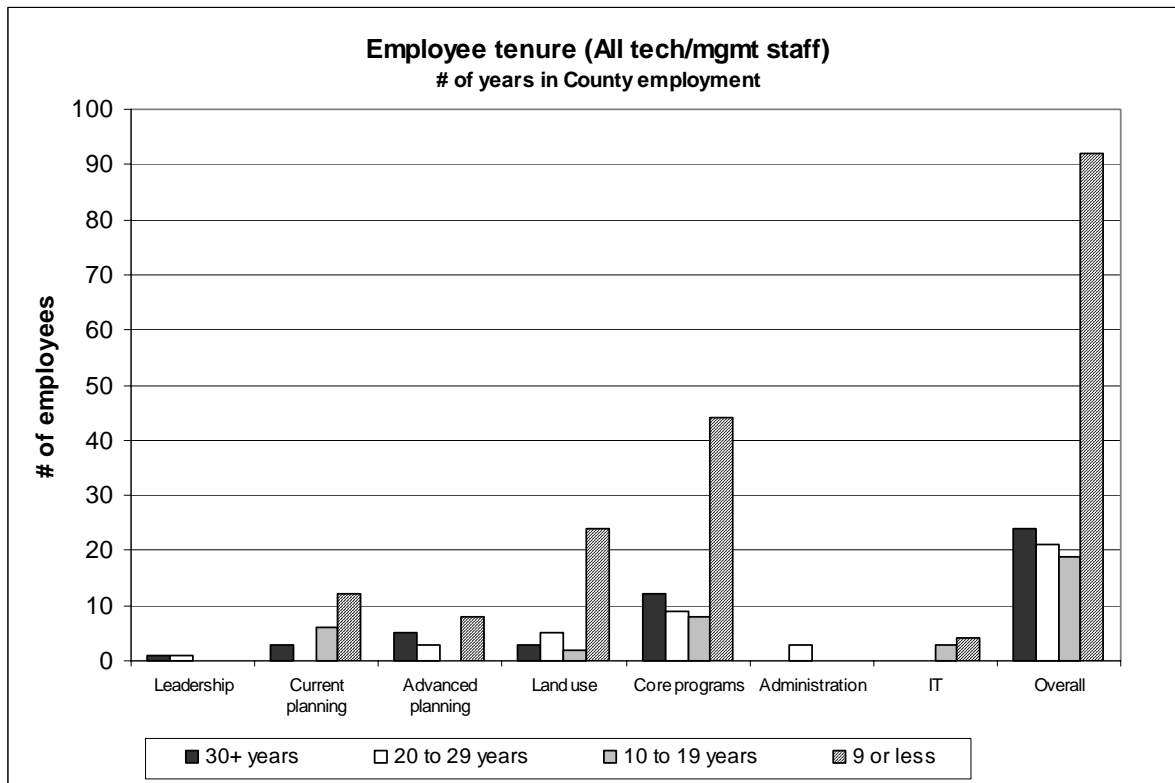


Figure 31 shows agency tenure for managerial staff only. As seen in the chart, the tenure of the managerial staff, especially those in core programs (e.g., Advance and Current Planning) demonstrates an inverted pyramid shape with most managers having high tenure (i.e., 30+ years in County employment). Ideally, the numbers of staff in each cohort would be more balanced thereby providing a supply of younger supervisors to replace those retiring.

**Figure 31 – Employee Tenure (managers only)**

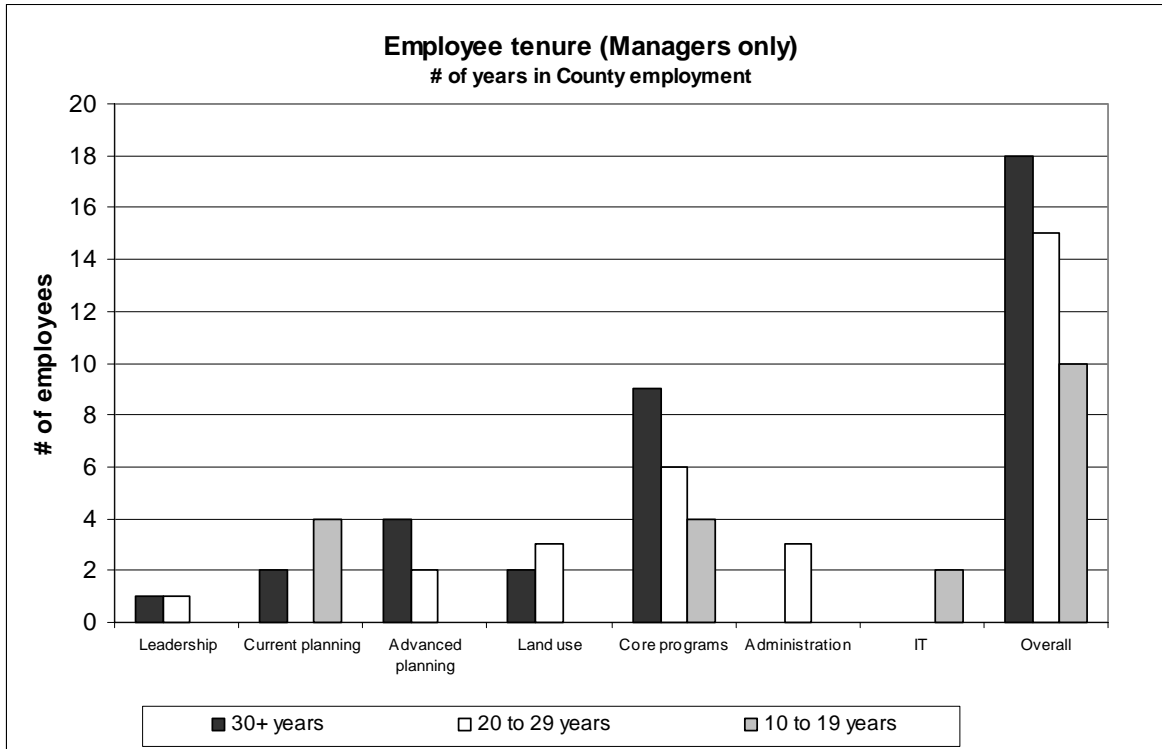
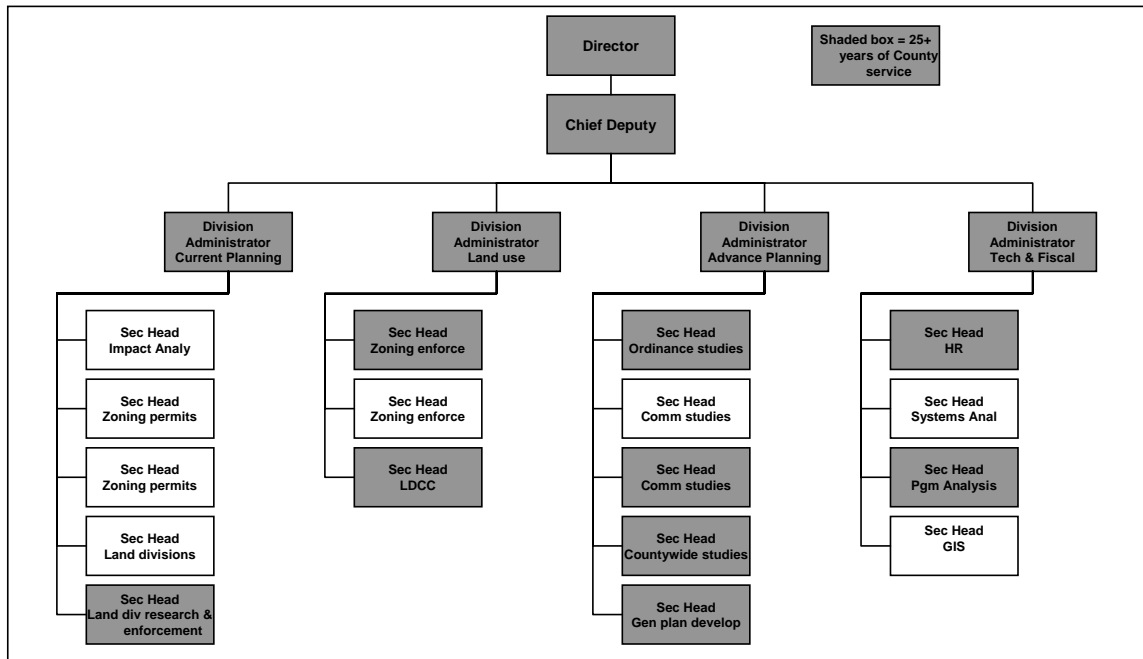


Figure 32 shows the current organizational structure of DRP highlighting managers with 25 years or more of County employment

**Figure 32 – Impending Retirements**



These tenure statistics point out a serious risk area for DRP. The agency will suffer a severe loss of managerial and institutional knowledge in the next few years. Without a supply of mid-tenure employees to replace the high number of retiring employees, the agency will be faced with:

- Less overall skill and knowledge to address land use issues and development applications,
- A relatively smaller pool of qualified employees to promote into open positions. In fact, there are not enough employees today to replace the high-tenure group should they all retire in the next two to five years which is a distinct possibility, and
- Loss of institutional knowledge.

Because of the layoffs and hiring freeze of the 1990s, the agency missed an opportunity to retain and groom successors to these soon-to-be-retired managers and technicians.

There are no good options for addressing this imbalance. Consultants are available but are more costly and take away accumulated knowledge when their contracts expire. Recruiting from outside the County has a negative impact on morale, is costly and probably not realistic as many planning agencies are also facing similar difficulties. The agency may have to hire retiring managers back on contract to sustain the agency until the younger, less experienced staff gain the necessary skills and experience. This is a feasible solution unless turnover among the younger staff is also a problem which it is in certain areas. Managing excessive turnover should be part of a good succession planning strategy.

The agency's strategic plan includes several strategy elements for addressing HR issues:

- Initiate a leadership and team-building program,
- Develop a strategic workforce plan,
- Conduct a training needs assessment, and
- Update assignment, rotation and transfer policies.

These strategy elements should be included as part of a Department succession plan focused on the immediate strategic issue of loss of expertise and knowledge through retirements.

#### **Recommendation H-4: Develop a succession plan**

The succession plan should be directed at replacing the mid- and high-level managers who may be retiring from DRP in the next few years. The plan should include the following strategies:

- A search strategy for going outside the County,
- A search strategy for looking within other County agencies for possible replacements,
- A plan for hiring retiring managers back on contract, and
- An aggressive program for training, mentoring and developing the current staff, especially those in code enforcement, for positions in current and advance planning (see Recommendations H-5 and H-6).

### **Skill Development**

HR management at DRP is primarily concerned with the clerical and administrative aspects of HR rather than staff development. Staff development seems to be delegated to line supervisors, occasional training opportunities and on-the-job training. These are all relevant strategies that when combined with a systematic approach to career development, can yield benefits. In order to build up technical and managerial skills quickly, DRP should start by building up their HR management to provide focus on various career development strategies.

DRP managers do recognize the need to be systematic about career development. During the recent strategic planning project, management produced a career management tool called the Job Skills Matrix. This tool allows staff to plot the types of skills and experiences they need to be promoted into higher job classifications and how they can obtain these skills and experiences. It is a useful tool, yet does not appear to have been rolled out in a systematic way. No staffperson we interviewed had either seen the Job Skills Matrix or heard of it even though it is available on the Department's intranet. With a little more effort in rolling out the matrix, it may prove a valuable tool in building up experience and improving morale.

Another skill development issue is new-hire training. Frequently, new hires are given the Zoning Ordinance as a training manual. Given the bulk and complexity of the Zoning Ordinance this can be too much, too soon for a new hire. There are several skill areas that can be included in a brief new-hire orientation. Orientation should include some of the basic organizational tenants of the County and DRP, how to read a plot plan, and so on.

According to DRP's FY 01-02 budget, approximately \$36,550 was spent on training. This amount is significantly lower than the recommended standard of 1.5% to 2.0% of annual salaries which translates to \$100,000 to \$150,000 in DRP's case.<sup>22</sup> In the FY 02-03 budget, \$60,000 is proposed for training. Although this is much higher than the previous year, it is still less than 50% of the recommended standard.

**Recommendation H-5: Prepare a Department-wide training plan**

The training needs of each staff member should be identified and scheduled into a Department-wide training program. The program should include on-site training in pertinent subject matters. The training program budget should be increased to be more in line with benchmarks.

**Recommendation H-6: Enhance new-hire training**

As part of the Department-wide training program, specific attention should be directed at a training program for new hires. The program would include important topics such as:

- How County is organized,
- Planning tools such as CSDs,
- Department computer systems,
- How to read maps,
- Career development opportunities and tools,
- How to interpret plot plans, and
- How to interact with the Board of Supervisors staff, County Counsel, District Attorney, etc.

**Recommendation H-7: Roll out the Staff Skills Matrix**

DRP should complete the rollout of the Staff Skills Matrix and assign supervisors as job coaches to interpret the matrix, suggest career development strategies and evaluate progress on a semiannual or annual basis. Developing the matrix is an exemplary move that should be followed up with a more aggressive use of the tool.

**Recommendation H-8: Hire a true HR professional dedicated to increasing competence and skill levels**

DRP should hire a true HR professional to develop and implement a skill development and employee development program. This program would be designed to aggressively build up knowledge and skills among the less experienced staff, monitor and address turnover, roll out new training, mentorship and skill development programs, and oversee employee evaluation.

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<sup>22</sup> The 1.5–2% benchmark is based on a literature search on the topic. For example, the March 2001 issue of the magazine *Training*, included a survey that showed the top five training programs among companies averaging 9.8% of annual salaries and the top 50 at 3.9%.

# Section I – Records Management

DRP maintains case files on all current and past development and permit applications. Records are also maintained in the form of minutes from the Regional Planning Commission and in the form of house numbering maps (HNMs). The agency has no formal records management function or manager. Instead, the Division administrator of Technical and Fiscal Services oversees records management.

## Status of Case Files

Case files are stored in open accordion-style file wallets. Once a case is completed, the papers are usually stored in the accordion wallets and then stored in one of three locations on either the 13<sup>th</sup> or 10<sup>th</sup> floor of the Hall of Records. These three locations are used to store case files that have been active within the previous six months. The three locations are open to anyone including passersby. The locations are also, as is any location in the Hall of Records, not sprinklered. This exposes the files to theft, misplacement or fire damage.

The files are organized by permit type and sequentially numbered. The shelves containing the files are labeled as to their contents. There is no checkout procedure for the files stored at the Hall of Records. Indeed, anecdotal information suggests that a fair amount of e-mail within DRP is devoted to searching for files that have been removed from the file rooms and not returned.

Many of the case files contain duplicate or extraneous information that could be purged from the file once the case is completed. This extraneous information not only increases the volume of paper that must be stored, it also makes it more difficult to revisit the file during subsequent permit modifications, redevelopment or for periodic inspections.<sup>23</sup>

Files that are inactive are stored off site at a private record storage facility in the City of Commerce called FileKeepers. Records stored at FileKeepers can be retrieved in a matter of a couple of days upon request.

### **Recommendation I-1: Produce fiche copies of the more critical case files**

The DRP should produce fiche copies of the most critical case files in the archives. These would include contentious projects, projects with a long build-out program that will be revisited in the future, or projects subject to ongoing inspection. DRP should also consider imaging case files if that proves more economical than fiche.

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<sup>23</sup> Retention periods for cases is basically forever since the improvements, impacts and conditions associated with permits last for decades.

**Recommendation I-2: Hire a file clerk to maintain and track case files; develop a computerized case file log**

The DRP should hire a file clerk to maintain and track the storage and movements of all DRP case files. This individual could also be charged with entering case file data into the KIVA system, converting maps to the GIS or scanning critical case files into digital images. DRP should create a simple computerized log for all case files. All files should be logged including those located in off-site storage. Also, case files should be stored in a secured location. The file clerk assigned to track these files should also monitor the individuals who wish to review the files to assure materials are not removed from the files.

**Recommendation I-3: Install fire suppression**

Short of installing sprinklers throughout the building, DRP should investigate and install some sort of fire suppression system in the file rooms and map room.

**Recommendation I-4: Strip files prior to storage**

DRP staff should strip case files of duplicate or extraneous materials once a case is permitted and prior to the case going into storage. This will cut down on storage needs and make it easier to interpret the file in the future. Some duplicate materials, such as maps may be helpful and should be retained.

## Status of House Numbering Maps

HNMs are large paper maps that show parcel boundaries, parcel numbers, zoning, street addresses, and the case history on parcels such as current or prior CUPs or plot plans. DRP maintains a complete set of HNMs on the 13<sup>th</sup> floor in an unsprinklered room. Some outlying parts of the County are mapped on “fly sheets,” large maps that contain the same information as HNMs. HNMs receive heavy use. They currently constitute the authoritative record of parcel boundaries and case history in the County. They are used to research parcel history, identify parcel numbers, identify zoning, and so on.

HNMs are not backed up in either paper or digital form. Until recently the information from the HNMs was stored on the CAD system (see Section J) but as CAD is no longer being maintained, the HNMs stand alone without a reliable backup. Should the maps become lost through some disaster such as a fire, they would be extremely difficult and time consuming to replace (i.e., the County would have to recreate the information from case files assuming those were not also destroyed in the same disaster).

Duplicate HNMs are stored in the Department of Public Works field offices for use by DPW field staff and DRP staff when they are around, but these maps are not synchronized with the set at the Hall of Records and are, therefore, not a reliable record of parcel or case history.

DRP will soon take custody of a scanner, lent by the County CIO, that is capable of digitizing the HNMs. Although this is not a substitute for a real digitized mapping system such as a GIS, it does provide some insurance against catastrophic loss. As of yet, there is no plan

for digitizing the maps using the scanner. Until parcel-level zoning data is stored on the GIS (a current project that will be completed in two to three years) the County is at substantial risk of losing this important record.

DRP management is aware of the risks involved but has not acted quickly to secure the necessary equipment and staff support to generate digital copies of the maps. The Business Automation Plan includes a document management system among its proposed IT enhancements that would include backing up case files and maps, but the critical nature of these documents makes it imperative that the agency act quickly.

**Recommendation I-5: Produce a digital backup of the HNMs using a scanner**

DRP should immediately make arrangements and dedicate resources to digitizing the HNMs to protect against catastrophic loss due to fire. HNMs themselves should be phased out and archived as the GIS is completed over the next two to three years.

# Section J – Information Technology Management

The DRP organization chart shows responsibility for information technology divided among three sections within the Technical and Fiscal Services Division:

- Systems Analysis;
- Geographic Information Systems (GIS); and
- LDMA (Land Development Management Agency), which provides database management for CTRK.

In reality, the two section heads for Systems Analysis and GIS are at equivalent levels, and the nominal section head of LDMA reports to the Systems Analysis section head.

The Systems Analysis unit is responsible for the Department's internal IT functions, including maintenance of the Department's local area network (LAN), desktop hardware and software support, web publishing, and the update of maps and maintenance of the House Numbering Files on the Computer-Assisted Drafting (CAD) system. This unit has seven budgeted and six filled positions.

The GIS unit provides Departmental-wide GIS support, and has taken the lead on several Countywide GIS initiatives. These include the successful completion of the Digital Ortho Aerial Imagery Project, which provided digitized aerial imagery for emergency planning, property assessment, facilities management, flood control, planning, and zoning efforts. The project was managed by DRP, with funding contributions from the Department of Public Works (DPW) and the County Information Office (CIO). The GIS unit is budgeted for six staff and currently has four filled positions.

The Database Manager (LDMA) consists of one employee whose time is split in half between maintenance of the Department's case tracking database (CTRK) and the Department's web designer. The unit is budgeted for two positions, with one filled.

## Business Automation Plan

DRP published a Business Automation Plan in January 2002. This plan approximates an IT strategic plan and discusses IT strategies, enterprise alignment strategies, organizational goals and an IT operating plan for the next three years.

Significant IT goals in the plan include:

- Document management system that would enable imaging of case files and making them available over the agency's local area network (LAN),
- Rolling out handheld computing devices for zoning enforcement staff,
- Integrating the GIS with the CTRK case tracking system so that cases and GIS maps would be linked,

- Computer training,
- New website features such as query of GIS maps, and
- Electronic permitting possibly as part of a new permit tracking system such as KIVA.

These are all useful IT strategies that would improve agency productivity and service levels. Many of these strategies are also mentioned in recommendations in this report. The plan only tangentially covers the topic of an enterprise-wide case tracking and permitting system, an improvement that is really needed. The plan is also light on tying these IT improvements to a broader business or service strategy. As discussed in Section A, DRP's strategic plan also mentions electronic permitting, document management and enhanced website features. Ideally, the two documents should be much more harmonized.

### **Recommendation J-1: Update the Business Automation Plan**

The DRP should update the Business Automation Plan taking into consideration, in this order:

1. The business strategy needs and IT elements of this Management Audit, and
2. The agency's overall strategic plan.

This will ensure that all three documents support each other and target the same set of results.

## **IT Staffing**

The DRP has had a chronic problem in filling vacant IT positions either because of hiring freezes or an inability to recruit for certain specialties such as GIS. Overall, the IT function within DRP has four unfilled positions out of 15 total. This has had severe consequences in terms of the Department's ability to maintain key core business applications and files, such as the House Numbering Maps and its case management system, CTRK.

### **Recommendation J-2: Fill vacant IT positions**

County Human Resources should make exceptions from the current hiring freeze and authorize DRP to fill the vacant and budgeted IT positions. These positions are necessary if the DRP is to successfully move its case tracking system (CTRK) to DPW's new Development and Permit Tracking System (KIVA), to migrate the mapping system to GIS and to support the co-location of DRP staff in field offices. Estimated cost= already budgeted.

## **Mapping and Geographic Information Systems**

The House Numbering Maps (HNMs) are the primary repository for zoning and setback changes. As new development is completed, and as zoning changes are authorized, these changes are noted manually on the relevant maps (which include the house numbering maps, the index maps and the fly sheets). These manual notations were also supposed to be updated in DRP's electronic HNM files stored in the CAD system. However, there have been no updates since January 2002, and only sporadic updates prior to then.

Originally, DRP and DPW used compatible CAD software from the same vendor (ComputerVision) which was logical since DPW was responsible for developing and maintaining the County's base maps. DRP received the base map files from DPW and, using the CAD system, created the zoning layers to produce the HNMs. Several years ago, DPW changed their CAD software to Microstation and, at roughly the same time, both DRP and DPW started to use the same GIS software (Arc/INFO). Note that CAD and GIS are different approaches: CAD is a drawing approach, in which maps are created by essentially drawing into a "picture" type file; while GIS is a database-oriented approach, in which other data (such as zoning) is displayed on top of geographic data.

DRP continued to use its CAD system for the HNMs but had fewer staff who knew how to modify the system to update zoning changes. DRP currently has one CAD mapper, whose job duties are primarily focused on creating maps for issues going to the Regional Planning Commission. There have effectively been no updates to the HNMs in the CAD system since January 2002. This means that there have been only manual updates to the hard copy maps for zoning changes in DRP since then.

An initial inventory, conducted by DRP's GIS staff, of a sample of the HNMs, revealed an average of eight years since the last update in DRP's CAD system. Several of the maps had not been reprinted in over 20 years and there were several missing maps. The inventory also recorded how many manual notations had been made on the maps directly; the range was between zero and over 30 manual notations per map. Eventually, the CAD system will be retired altogether and all mapping functions will be migrated to the GIS.

### **GIS Conversion**

Through the initiative of DRP's IT staff, the Department has been successful in obtaining funding from the County CIO for converting the Department's maps to GIS, a project called the "Zoning Map Conversion and Integration Project." The project is a partnership between DRP and DPW, with DRP providing project management and staffing and DPW providing staff and financial support.

The purpose of the project is to convert zoning information contained in maps onto a common GIS platform for ready access by DRP, DPW and other County staff and, eventually, the public. This is a massive project that is long overdue. As discussed earlier, the current hard copies of the house numbering maps, the index maps and the fly sheet maps are physically deteriorating, and DRP no longer has the staff skills to update or re-create the HNMs in its old CAD system.

The project was approved by the CIO in January 2002 and the initial timeline called for DRP to hire staff by June 2002 to coordinate the work of outside contractors who would actually perform the necessary digitizing. As of the time of this analysis, no action had been authorized by DRP management to begin the process of hiring the necessary staff. Thus the project is at least three months behind schedule already. Under the best of circumstances, the project would have required two to three years to complete. In the interim, there is no appropriate solution permitting DRP to update and rely on the CAD system. Thus DRP (and by extension DPW) will be facing a two- to three-year period during which zoning changes will only be updated manually before GIS is rolled out.

Successful implementation of this project is critical to the long-term viability of the Department's ability to continue to perform its mission-critical function of serving as the County repository for zoning information. The Zoning Map Conversion and Integration

Project should be given the highest priority in the Department, and should have full support. It is sometimes difficult to maintain a high level of support for a long-term project in the face of daily demands. Nevertheless, the importance of this project to DRP's core business requires the hiring of staff who can be dedicated to this project during the construction period, and who would then maintain the systems once the system is implemented.

**Recommendation J-3: Expedite the implementation of the Zoning Map Conversion and Integration Project**

The DRP should take immediate steps to accelerate the Zoning Map Conversion and Integration Project. DRP may want to consider hiring planning student interns to systematically inventory the existing maps and enter the key data (e.g., parcel number, zoning, case history) into the GIS. .

### Case Tracking Systems

CTRK is the Department's case management tracking system. It is the primary database, accessed by almost all members of the Department, to track development applications, permits, inspections and zoning enforcement cases. Since CTRK is based on Microsoft Access, it is primarily a database rather than an information management tool. It cannot manage data in such a way as to improve productivity, integrate various parts of the Department, provide management data, and so on. For example, CTRK does not have a tickler function that identifies complaints or CUPs that need urgent attention and pushes these items onto an inspector or enforcement agent.

CTRK is also not linked with case management systems used by other County agencies. As discussed in Section F, DRP, Building and Safety, Health Services and Fire may have violations logged on the same property, but their respective systems would never be able to identify these shared violations and coordinate activities. These limitations severely hinder the productivity and effectiveness of DRP staff.

CTRK was developed and formerly maintained in-house by a DRP employee who has since retired. The current CTRK administrator has Microsoft Access skills, but little experience with CTRK. As of the date of this report, DRP can maintain the CTRK database, but does not have the skills or resources to accommodate any major revisions or enhancements to CTRK.

There has been some question raised as to the accuracy and currency of the CTRK database. For example, some zoning enforcement agents indicated that they do not regularly update CTRK and rely on their paper records. The CTRK system also does not include desired quality assurance functions. For example, CTRK permits entry of a four-digit book number followed by blanks for the three-digit page number and three-digit parcel number. Without the page and parcel numbers, however, extensive research is required to determine exactly what parcel is being referenced.

The CTRK system is slated for replacement in conjunction with DPW's Development and Permit Tracking System II, which involves the implementation of KIVA GIS/web-enabled software produced by the Accela Corporation of Salt Lake City. The County recently approved the contract with Accela to purchase the software for DPW. The contract includes provisions for expanding the license for other County agencies including DRP.

KIVA has the following modules or functions that would be useful at DRP:

- Plan routing and routing history to track the progress of an application,
- Conditions of approval maintenance,
- Clearance checklist to track clearances from multiple agencies,
- Grouping of permits for larger projects,
- Inspection history by type of permit,
- Daily computer-generated priority lists for inspections and complaints,
- Follow-up action lists for outstanding complaints,
- Database of communications sent to applicants and complainants,
- Priority assignments for critical complaints and violations,
- Direct interface with ARCVIEW GIS system to link case history with GIS mapping,
- Tracking of parcel history including permits, violations, ownership, etc.,
- Linking complaint history with outstanding or new permit applications to prevent violators from conducting new projects,
- Website functions such as online permits, complaint data entry and case status, and
- Remote inspector functions such as downloads/uploads from/to handheld devices such as Personal Digital Assistants (PDAs).

Many of these functions are absolutely critical for implementing the more beneficial recommendations in this report. For example, moving permitting, inspection and enforcement functions out to the field requires an integrated case tracking system. Coordinating the application processing, conditioning, enforcement and inspection functions of DRP, Health Services, DPW and Fire also require an integrated, common software platform such as KIVA.

Enterprise-wide case tracking and permitting packages have been available for years and are used in many peer jurisdictions. DRP has taken a cautious approach on this, opting to evaluate these packages and their degree of consistency with DRP business processes. Thus far, the changes to DRP processes that would be required have been deemed to be too extensive to warrant the investment. Indeed, a case tracking system is not included in either the agency's Business Automation Plan or the Strategic Plan. Meanwhile, the Department of Public Works (DPW) has taken the lead and selected the KIVA package produced by Accela Corporation thereby setting the technology standard for DRP and the rest of the County. Accela has submitted a proposal to DRP to conduct a "fit analysis" in order to evaluate ease of implementation, but the agency has not yet taken any action.

The migration from CTRK to KIVA has the potential to enhance many of DRP's core business processes. To facilitate this move, DRP staff that are familiar with the business aspects of the case tracking system should be involved, in addition to the IT staff. There are an additional two positions that are budgeted but have not been filled in the Systems Analysis unit and LDMA. The DRP should seek to use at least one of those positions to provide project management support for the implementation of KIVA.

#### **Recommendation J-4: Implement the KIVA system for case tracking**

DRP should provide staff support to perform initial work such as the fit analysis, hardware requirements, etc., for implementing the KIVA system. Should the analyses demonstrate the feasibility of the system in DRP, the Department should implement modules supporting code enforcement, current planning, inspection

management functions, as well as the web-based applications available from KIVA. (See Recommendation F-7.)

## DRP Web Functions

DRP maintains a website ([www.planning.co.la.ca.us](http://www.planning.co.la.ca.us)) that is linked to the County's homepage. The website includes these useful features:

- Addresses and operating hours for the Hall of Records and the field offices,
- Fee schedule,
- Planning Commission agendas,
- Case reports and ordinances,
- Ability to download and print applications for plot plans, zone changes and temporary use permits, etc.,
- Online zoning violation complaint form,

The agency could improve the website and add other useful features but may find it more practical to utilize the online features of a packaged case tracking application, such as the KIVA system for online permitting, requests for service (i.e., KIVA jargon for complaint data entry), checking the status on a permit application, and requests for inspections. See the preceding section for details on KIVA and a recommendation.

## IT Financing

DRP currently has a surcharge on zoning permits for the CTRK system. This surcharge generated \$50,974 in 2000-2001, and was estimated to generate \$32,000 in 2001-2002.<sup>24</sup> While these funds should be used to support DRP's upgrade of the case tracking system to KIVA, there is the concomitant need for providing a steady funding stream for upgrading and modernizing all of DRP's systems such as GIS/zoning map conversion, KIVA permit tracking system, case file imaging, and so on. It is recommended that DRP either establish a new surcharge on permits, or increase the current LDMA surcharge, with the revenues from an increase dedicated to enhancing DRP's technological capabilities in order to allow for greater electronic access of zoning and permit information by the public.

### **Recommendation J-5: Increase the existing IT surcharge**

The Board of Supervisors, in collaboration with DRP and County Counsel, should modify existing ordinances to either increase the existing surcharge on permit processing and/or apply the surcharge to other types of permits to provide ongoing funding for IT modernization. Increased surcharge revenue should be used to procure or develop IT improvements such as the KIVA system, GIS, zoning map conversion or new website features.

<sup>24</sup> Department of Regional Planning, projected revenue for FY 01-02, dated 4/3/02.

## Section K – Ex-Parte Communication

The current planning process is considered quasi-judicial in that there are many due process characteristics and similarities with the court system:

- Many application types are discretionary in that approval is granted at the discretion of various review authorities,
- Discretionary review is not always straightforward, many decisions require balancing competing sets of facts and interpretation,
- Because all decision-making is based on standards, laws, ordinances, findings and interpretations that are available to the public, decisions are free from any unknown bias or undue influence,
- A decision by a review authority can be appealed to a higher level of review on up to Superior Court and beyond, and
- Proceedings of the review bodies and the evidence used in the decision-making are public.

Because the process is quasi-judicial in nature it should have the same protections against undue influence as is common in other judicial systems. This would include preventing any improper communication with review authorities or the staff assigned to preparing reports or recommendations to the review authorities, specifically the Board of Supervisors, the Regional Planning Commission or Hearing Officers.

### Ex-Parte Communications

Communication between any member of a review authority or staff assigned to that review authority and an interested party that is outside of the public purview or not entered into the official record is called ex-parte communication. An example would be an applicant contacting a planning commissioner privately to convey information about his/her case.

During our review members of the community expressed concern with the level of ex-parte communication that has been occurring with regard to cases before the Regional Planning Commission. Much of this communication has been between interested parties, other than the applicants, and DRP staff regarding open cases, and is not documented in writing or included in the public testimony or case file available to the public. While the extent of this ex-parte communication cannot be determined quantitatively, sufficient anecdotal evidence exists to warrant concern.

Just as the amount of ex-parte communication is hard to quantify, the effect of this communication is also hard to determine. A key negative impact is the perception that decisions are not free from any undue bias, that influential interested parties are able to affect the outcome of the decision-making away from the public view. This can lead to

decisions being made based on the preferences of these influential parties, rather than on a strict interpretation of facts, findings and standards and on the testimony of the public. This can, in turn, reduce confidence in the decision-making process, increase the public's cynicism of governmental processes, increase the likelihood of appeals of Hearing Officer and Planning Commission decisions, and result in inconsistent treatment of similar cases.

As a procedural safeguard and to protect the integrity of the decision-making process, more stringent policies regarding ex-parte communication should be in place. This will increase the public's and the applicant's confidence in the decision-making process and facilitate more consistency in decision-making and less cause for appeals.

### Recommendation

#### **Recommendation K-1: County Counsel should develop and implement a policy regarding ex-parte communication**

The policy should require that certain types of communications from interested parties directed at the Regional Planning Commission, DRP Hearing Officers or DRP staff regarding open current planning or enforcement cases be communicated in writing or via electronic mail. This policy should be limited to advocated recommendations or positions on a case. A paper copy of all communication, including electronic mail, should be entered into the case file and be available to the public prior to a hearing or any decision on the matter.

# APPENDICES

Appendix 1 – Current Planning Process Descriptions

Appendix 2 – Current DRP Performance Measures

Appendix 3 – Glossary

Appendix 4 – County maps

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## **Appendix 1 – Current Planning Processes**

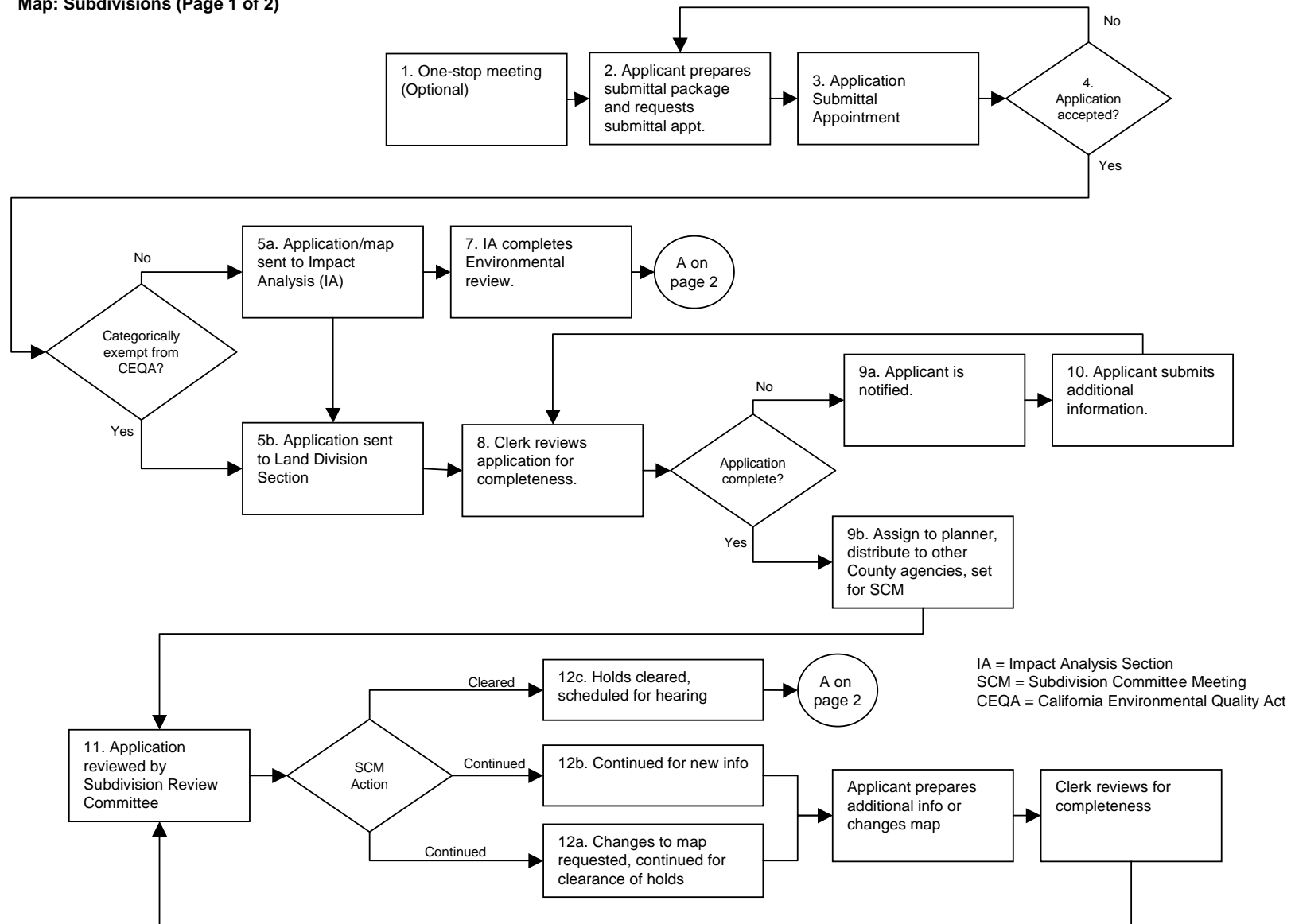
### **SUBDIVISION MAP PROCESS**

The Land Division Section processes requests for Tentative Subdivision Maps, Tentative Parcel Map and Lot Line Adjustments as well as accompanying applications. In addition to the above applications, the section also reviews Final Maps for conformance to the Tentative Map and Revised Exhibit “A’s”(i.e., Plot Plans that indicate changes from original approval). The classic subdivision case is a tract of single family residential home lots in the suburban fringe of Los Angeles. Subdivision planners deal with a lot of residential tract maps submitted by professional, sophisticated development companies as well as mom and pop types who are trying to split their single family residential lot into 2 or 3 parcels.

## Appendix 1 – Current Planning Processes

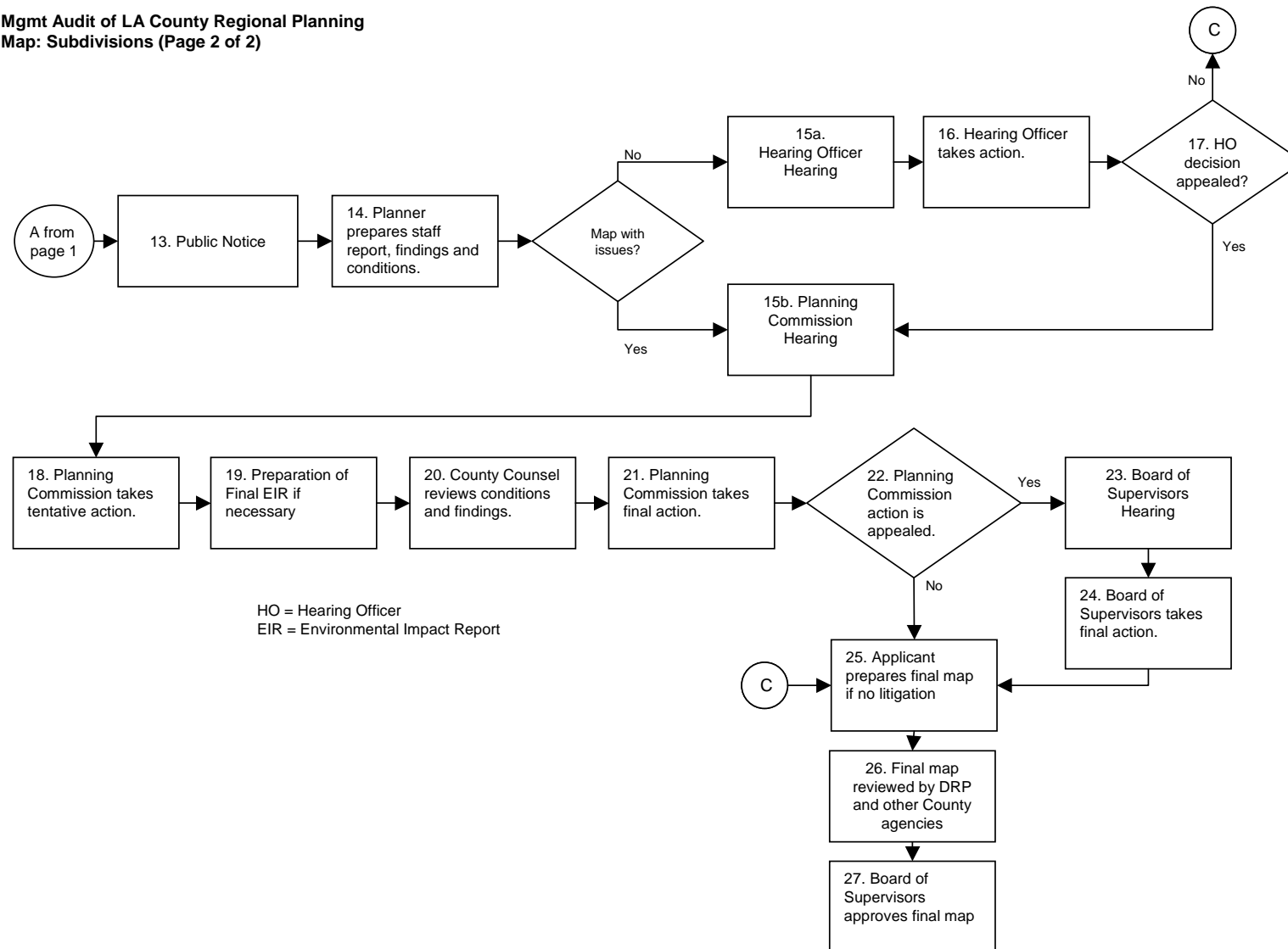
Figure 31 – Subdivision Review Process

Mgmt Audit of LA County Regional Planning  
Map: Subdivisions (Page 1 of 2)



**Figure 31 – Subdivision Review Process**

Mgmt Audit of LA County Regional Planning  
Map: Subdivisions (Page 2 of 2)



## **Appendix 1 – Current Planning Processes**

### **Subdivision Review Process Steps**

**Step 1** An optional One-stop Meeting is held with the applicant/developer and a representatives from Public Works, Fire and DRP (a planner from the Public Counter). It is intend to assist applicants who wishes to submit a parcel or tract map. Presently it takes approximately six weeks between the time the applicant requests the meeting and the meeting is held. The PRD representative from the Pubic Counter may or may not be familiar with the rules and regulation of the Subdivision Act. They are knowledgeable about the zoning and the types of restrictions that may occur due to the zoning regulations. No one discusses potential environmental issues.

**Step 2** Applicant prepares the submittal package and requests an appointment to submit the application. It presently takes about 4 weeks to obtain a submittal appointment.

**Step 3** The applicant submits the required maps and forms at the submittal appointment. The Counter Planner reviews the application against a checklist of requirements.

**Step 4** If the application is accepted and a deposit fee is paid. Later, Land Division Section frequently determines, that the accepted application is not adequate. The clerk in Land Division then holds the application until the applicant provides the basic information. The reason for accepted incomplete applications are many, including insufficient training of the person accepting the application, unclear directions regarding what is required, and the desire not to make the applicant wait for another submittal appointment. If the application is rejected as incomplete, the applicant makes revisions to his application as instructed. Frequently changes are significant and another appointment to submit the application is necessary.

**Step 5a** One set of maps and the application forms from the submittal package is set aside for Impact Analysis. Presently it is taking between 1 and 2 weeks from the time the application is submitted to the time it is picked up by Impact Analysis. According to State law, an Initial Determination that the application is complete and all necessary information has or has not been provided, needs to be performed within 30 days of submittal. In order to meet this deadline, the initial environmental review needs to be completed within 30 days. With the delay of getting the cases to Impact Analysis, it is almost impossible to comply with the State law.

**Step 5b** The remainder of the submittal package is sent to the Land Division Section of Current Planning. Generally the Counter staff delivers all new case files once a week delaying the start of project review up to week. This problem is addressed in

**Step 7** Impact Analysis Section reviews the submittal package and completes environmental process. It determines if the project is Categorical Exempt or prepares the Initial Assessment. The Assessment determines if the project should receive a Negative Declaration or additional information special study(ies) or an Environmental Impact Report is needed. See Figure 4 and related discussion in the Impact Analysis Section for additional details and recommendations on this process.

**Step 8** The Land Division's clerical person reviews the application to determine if the application is adequate or if it needs additional information.

**Step 9a** If additional information is required the applicant is notified by phone and the file is put aside until information is supplied.

**Step 9b** If the application is adequate, it is assigned to a planner and sent to the following county agencies: Fire, Park and Recreation, Health Services and Public Works, and scheduled for consideration within 30 days if scheduling permits, at the Subdivision Committee Meeting (SCM).

**Step 10** The applicant provides the necessary information and submits directly to the Land Division section.

**Step 11** The SCM is held to discuss the project and to identify outstanding issues and to determine if the application is considered complete. Representatives attend the meeting from Fire, Park and

## Appendix 1 – Current Planning Processes

Recreation, Health Services and Public Works. The applicant is also present. A representative from the Land Division Section leads the meeting. Written comments from some of the attendees are available. Other comments are given verbally. Generally the project's environmental status is not discussed and a representative from the Impact Analysis Section is not present.

**Step 12a** If changes to the map are required, a second Subdivision Review Meeting is scheduled. Prior to the scheduled meeting, the applicant makes the necessary changes and resubmits the map directly to the Land Division Section. The submitted map is sent to Fire, Park and Recreation, Health Services and Public Works agencies. It is not sent to the Impact Analysis Section.

**Step 12b** If the map is satisfactory, but needs very minor changes or additional information is required, the applicant is directed to submit the required information or map corrections directly to the Land Division Section and an additional SCM is not scheduled. The project is put on hold until the applicant submits the required information and the environmental review is complete. This is called the Clearance of Holds.

**Step 12c** All holds have been clear when no changes to the map are required, all necessary information has been provided and the environmental review is completed. The project is scheduled for public hearing with either the hearing officer or the Planning Commission depending on the project's complexity and public interest. This hearing usually occurs within 6 weeks.

**Step 13** The public is given Notice of the proposed project and the review period begins. Public notice includes the following: All adjoining property owners within 500 or 1000 feet (5th district only) are notified by mail within 30 days of the scheduled hearing; the project is noticed in the local newspaper as well as the Spanish language paper; and the site is posted with a large sign. Prior to the 30-day notice process the public does not receive any notice about the pending project unless the applicant contacts the local planning committees.

**Step 14** The planner writes the staff report, prepares preliminary findings and conditions without going into the field to see the site. Other agencies' conditions and any environmental mitigation are attached to Planning's conditions. Sometimes other agencies' conditions are not available until the public hearing. When this occurs, they are referenced as future attachments.

**Step 15a** A public hearing is held before the Hearing Officer.

**Step 15b** A public hearing is held before the Planning Commission.

**Step 16** The hearing office takes public testimony and approves or denies the project as proposed, or modifies the project and/or the conditions of approval for said project.

**Step 17** The Hearing Officer's decision may be appealed to the Planning Commission by the applicant or a member of the public. This new hearing will require the project to be renoticed.

**Step 18** The Planning Commission takes public testimony and indicates their tentative approval or denial of the project as proposed, or indicates their tentative approval of a modified project and/or the conditions. The public hearing is continued to a date certain for the County Counsel to review of conditions and findings.

**Step 19** If there is an EIR, the Impact Analysis section prepares Final EIR including response to comments.

**Step 20** County Counsel reviews all cases after the Planning Commission indicates their tentative approval. Counsel may and often does recommended changes to the proposed findings and conditions. This review and related recommendations takes between 6 and 10 weeks (longer review period if EIR). Planning then modifies the original findings and conditions to reflect County Counsel's directions.

**Step 21** The item is placed on the Planning Commission's consent agenda and final action is taken. Usually, but not always, there is no new staff presentation or additional public input.

## **Appendix 1 – Current Planning Processes**

**Step 22** The Planning Commission's action may be appealed to the Board of Supervisors by the applicant or a member of the public. This new hearing will require the project to be renoticed.

**Step 23** The Board of Supervisors holds a new public hearing, takes new testimony and reviews the record.

**Step 24** The Board of Supervisors takes final action.

**Step 25** If there is no litigation, the applicant prepares a final map in conformance to the approved tentative map and conditions.

**Step 26** Final map is reviewed by the DRP and other County agencies

**Step 27** The Final Map is approved by the Board of Supervisors

### **USE PERMIT PROCESS**

The Zoning Permits Sections process a variety of use permits. Many of these are discretionary meaning that the final form of a project is decided by a review body and can be denied outright (though that rarely happens). The bread and butter of the Zoning Permits Section is the Conditional Use Permit or CUP. CUPs are required for a variety of land uses from a regional land fill to a tool shed depending on the allowed land uses as stated in the zoning ordinance.

## Appendix 1 – Current Planning Processes

Figure 32 – Use Permit Process

Mgmt Audit of LA County Regional Planning  
Map: Use Permits (Page 1 of 2)

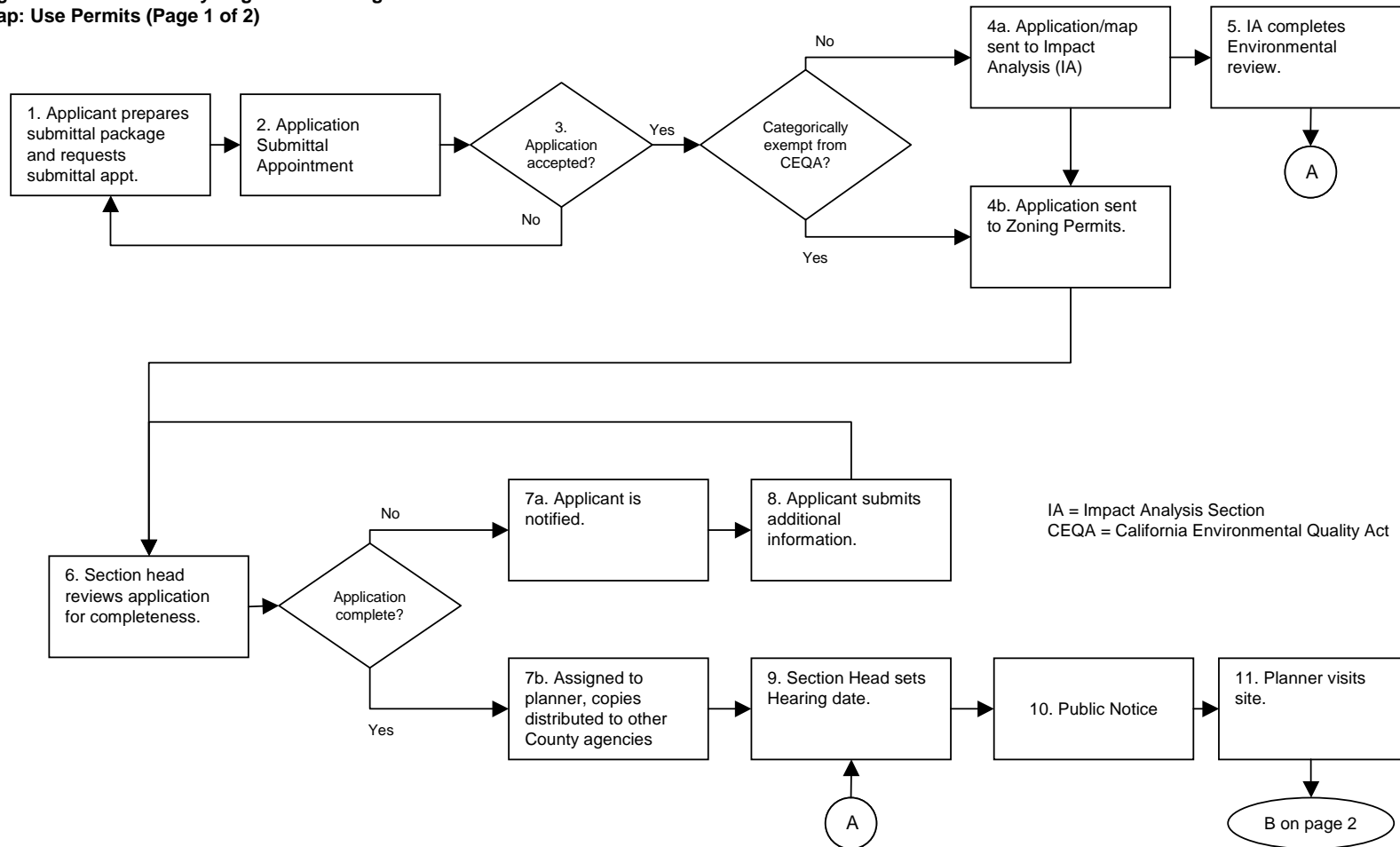
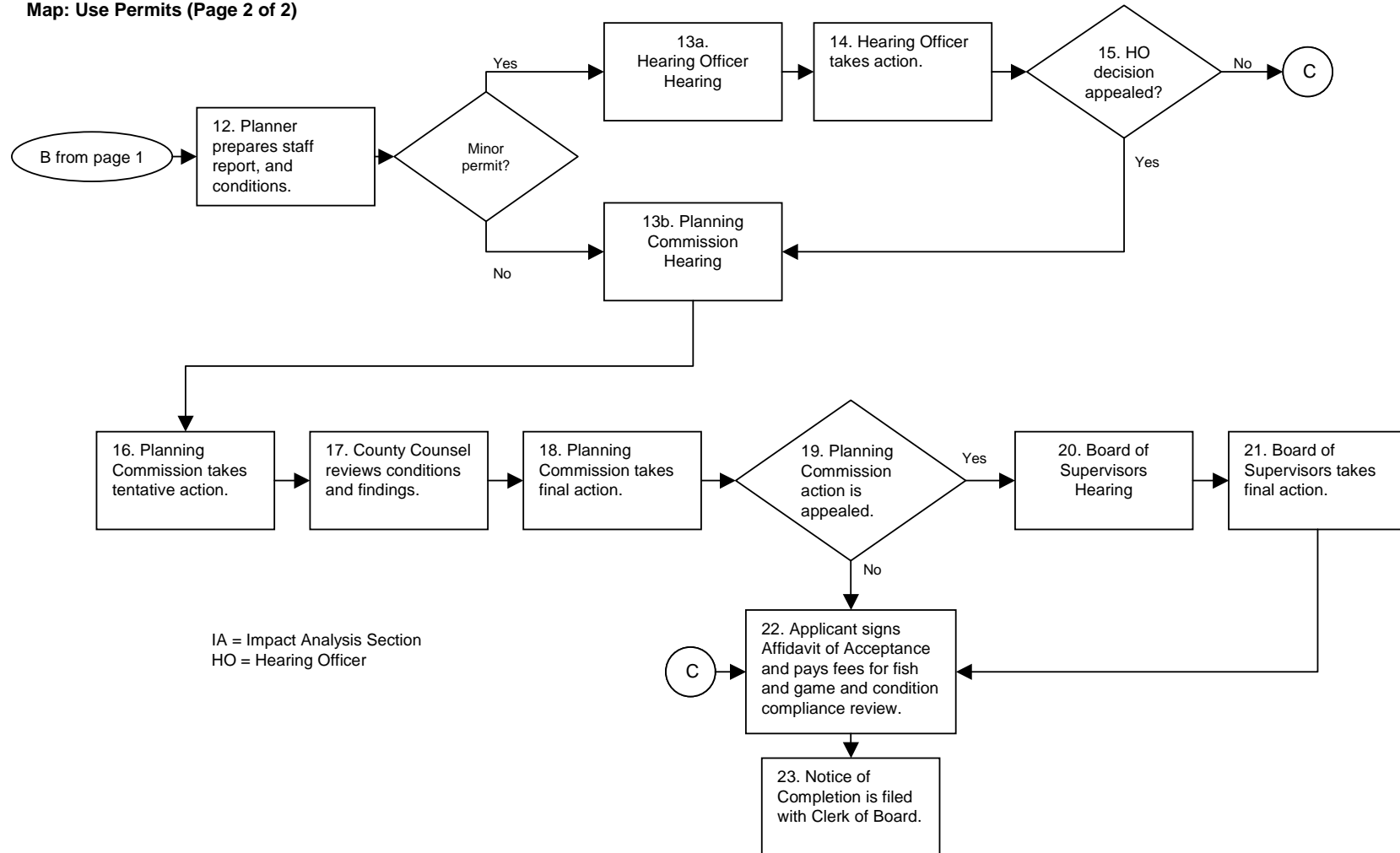


Figure 32 – Use Permit Process

Mgmt Audit of LA County Regional Planning  
Map: Use Permits (Page 2 of 2)



## Appendix 1 – Current Planning Processes

### Use Permit Process Steps

**Step 1** Applicant prepares the submittal package and requests an appointment to submit the application. Although upon demand, use permit applicants may have a One-stop Meeting. This service is generally not offered. There is no formal preapplication process available for conditional use permits.

**Step 2** It presently takes about 4 weeks to obtain a submittal appointment. At the appointment, the applicant submits the required maps and forms. The Counter Planner reviews the application against the checklist requirements.

**Step 3** If the application is accepted a fee is paid. Later it is frequently determined that the accepted application is not adequate. The reason for accepting incomplete applications are many including insufficient training of the person accepting the application, unclear directions regarding what is required and the desire not to make the applicant wait for another submittal appointment. If the application is rejected as incomplete the applicant can make revisions to the application as instructed and makes another appointment to submit. Once the application is accepted, a determination is made whether the project has a categorical exemption from CEQA.

**Step 4a** A single copy of the site plan and application from the submittal package is sent to Impact Analysis. Presently it is taking between 2 and 3 weeks from the time the application is submitted to the time it is received by the Impact Analysis Section. According to State law, an Initial Determination that the application is complete and all necessary information has or has not been provided needs to be done within 30 days of submittal. This necessitates the initial environmental review to be completed within 30 days. Due to the delay of getting the cases to Impact Analysis, it is almost impossible to comply with the State law.

**Step 4b** If the project is categorically exempt from CEQA, the remainder of the submittal package is sent to the Zoning Permits sections of Current Planning.

**Step 5** Impact Analysis Section reviews the submittal package. It determines if the project is Categorically Exempt. It then prepares the Initial Assessment and determines if the project should receive a Negative Declaration, needs additional information or study(ies), or Environmental Impact Report. It is possible that the Zoning Permits sections could do this preliminary review.

**Step 6** The section heads of Zoning Permits review the application to determine if it is complete or if it needs additional information. This should be a relatively easy task for any experienced planner. Waiting for the section head, which has numerous other responsibilities, to perform the review has delayed the processing of the application.

**Step 7a** If additional information is needed, the applicant is notified by letter, and the file is put aside until information is supplied. If it is a relatively simple problem the applicant may be notified over the telephone.

**Step 7b** If the application is complete, it is assigned to a planner. The planner sends a copy of the application to Fire and Public Works. Other agencies may have been notified through the Impact Analysis Section. It takes approximately one month for the agencies to respond.

**Step 8** The applicant prepares the necessary information, makes an appointment with the section head and submits requested additional directly to him for review.

**Step 9** The section head sets the hearing date and assigns the case to the project planner. Usually there are ninety days between the setting of the hearing date and the mailing of the public notices. The reason for this delay is that the Planning Commission and Hearing Officers calendars are full. See the Planning Commission Section for discussion and recommendations addressing the issue of time delays caused by a full agenda.

## Appendix 1 – Current Planning Processes

**Step 10** The public is given Notice of the proposed project. Public notice includes the following: All adjoining property owners within 500 or 1000 feet (5th district only) are notified by mail within 30 days of the scheduled hearing; the project is noticed in the local newspaper as well as the Spanish language paper; and the site is posted with a large sign. Prior to the 30-day notice process the public does not receive any notice about the pending project unless the applicant decides to contact the local planning committees.

**Step 12** The staff report and conditions are prepared. Other agencies' conditions and any environmental mitigation are attached to Planning's conditions. Sometimes other agencies' conditions are not available until the public hearing. When this occurs, they are reference as future attachments.

**Step 11** The project planner visits the project site. This step does not always occur prior to writing the staff report, conditions and findings. Often may occur after the report is written and right before the public hearing. By visiting the project site late in the process, the planner may become aware of previous undiscovered issues, which has been not addressed in the staff report or conditions.

**Step 12** The staff report and preliminary findings and conditions are prepared. Other agencies' conditions and any environmental mitigation are attached to Planning's conditions. Sometimes other agencies' conditions are not available until the public hearing. When this occurs, they are reference as future attachments.

**Step 13a** A public hearing is held before the Hearing Officer. It is the intent of the Zoning Permits Sections never to send any cases with an outstanding issues or controversy to the Hearing Officer. The reason for this is that if anyone appeals the Hearing Officer's decision, the Planning Commission then rehears it.

**Step 13b** The Planning Commission holds a public hearing.

**Step 14** The hearing office takes public testimony and approves or denies the project as proposed. He may also modify the project and/or the conditions of prior to acting.

**Step 15** The Hearing Officer's decision may be appealed to the Planning Commission by the applicant or a member of the public.

**Step 16** The Planning Commission takes public testimony and indicates their tentative approval or denial of the project as proposed or indicates their tentative approval of a modified project and/or the conditions. Hearing of said project is continued for the County Counsel to review.

**Step 17** County Counsel reviews all tentative approvals of the Planning Commission. Changes to the findings and conditions may be recommended. This review takes between 6 and 10 weeks. Planning then modifies the original findings and conditions if necessary and sends them to the Planning Commission.

**Step 18** The case is placed on the Planning Commission's consent agenda and final action is taken. Usually, but not always, there is no new staff presentation or additional public input.

**Step 19** The Planning Commission's action may be appeal to the Board of Supervisors.

**Step 20** The Board of Supervisors holds a new public hearing, takes new testimony and reviews the record.

**Step 21** The Board of Supervisors takes final action.

**Step 22** Applicant signs Affidavit of Acceptance and pays fees for Fish and Game and condition compliance review.

**Step 23** A Notice of Completion is filed with the Clerk of the Board.

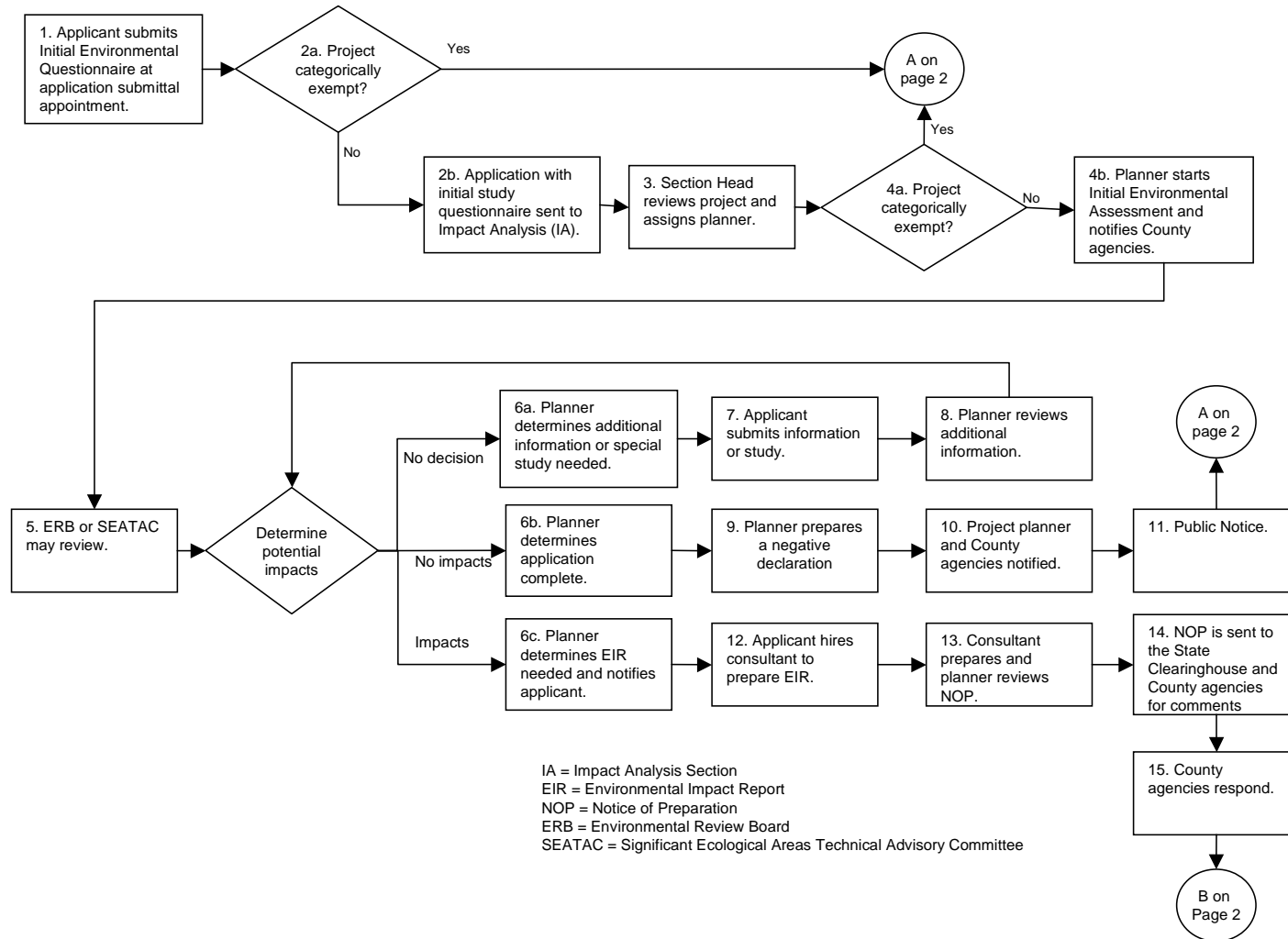
## **Appendix 1 – Current Planning Processes**

### **ENVIRONMENTAL REVIEW PROCESS**

Environmental review is included with all project review and approval processes. It is intended to assure the every project has minimal impact on the environment. The California Environmental Quality Act (CEQA) is the driving force behind impact analysis. CEQA generally outlines the rules, regulations and procedures that need to be followed in performing environmental review. Each jurisdiction, however, has some leeway in how the law is implemented. For example, some jurisdictions hire consultants to prepare the necessary research and then charge the cost to applicants. Los Angeles County requires the same research and environmental impact reports but allows applicants to hire their own consultants to prepare draft documents that are evaluated by DRP staff.

Figure 33 – Environmental Review Process

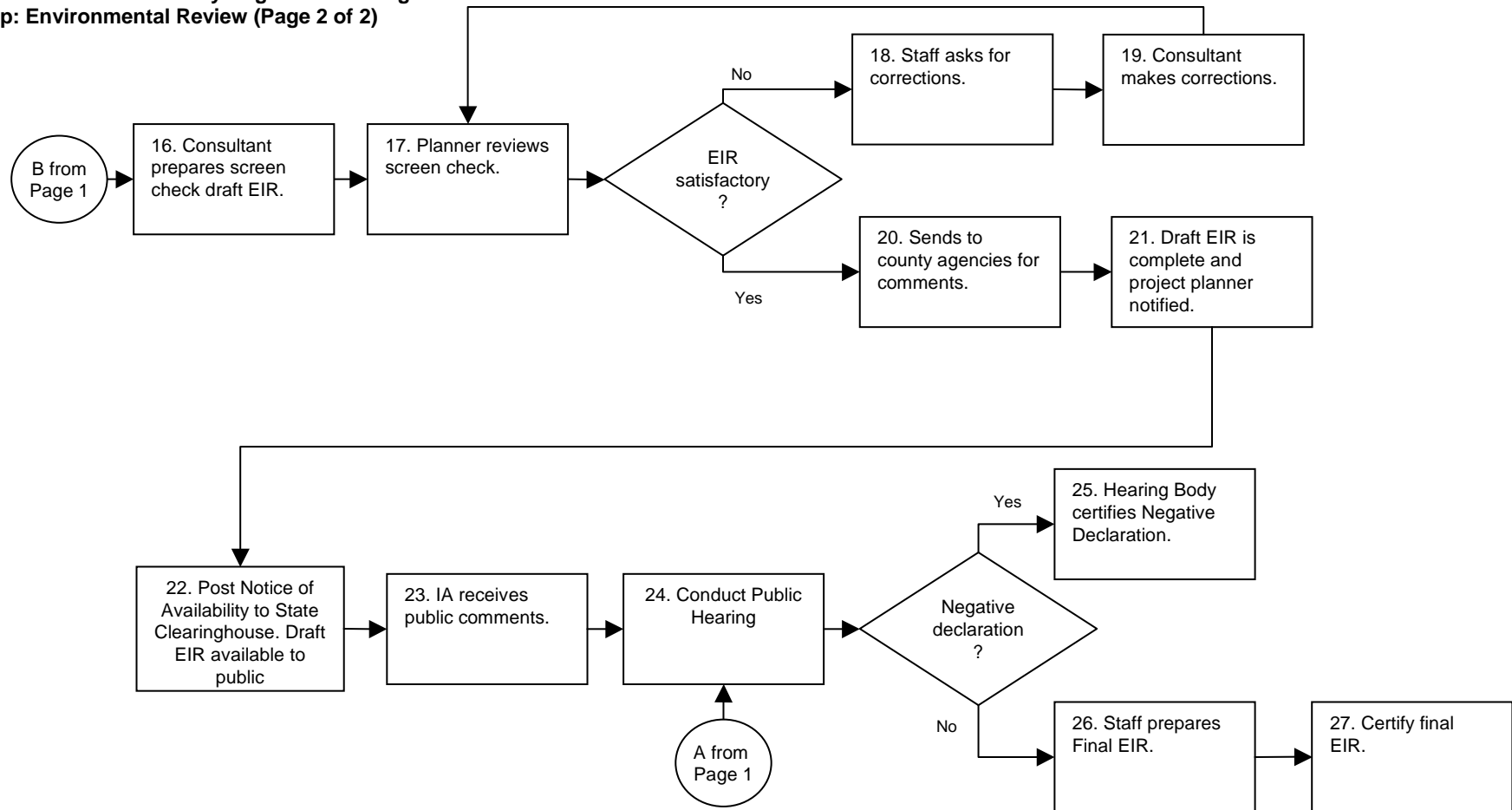
Mgmt Audit of LA County Regional Planning  
Map: Environmental Review (Page 1 of 2)



## Appendix 1 – Current Planning Processes

Figure 33 – Environmental Review Process

Mgmt Audit of LA County Regional Planning  
Map: Environmental Review (Page 2 of 2)



### Environmental Review Process Steps

**Step 1** The project application with Initial Study Questionnaire and other related documents such as photos and USGS map is submitted at the Application Submittal Appointment.

**Step 2a** The Counter Planner determines the project is Categorically Exempt. This saves the applicant the environmental fee required for the review.

**Step 2b** A single copy of the application, plot plan/map and environmental documents is set aside at the Counter for the Impact Analysis Section. If additional sets of submittal documents are necessary, the applicant is contacted after the application has been accepted. The time it takes for the application to be received by the Environmental Planner in the Impact Analysis Section from the Public Counter may be as much as three weeks.

**Step 3** The Section Head reviews the documents and based on the complexity of the project, is assigned to a planner.

**Step 4a** The planner may determine the project is Categorically Exempt. While some projects are determined to be Exempt upon submittal by the Counter Planner, the Impact Analysis Section reviews others first. This dual review system has lead to some Environmentally Exempt projects paying a fee while others do not. There have been times when projects needed environmental review even though the Front Counter has exempted the project.

**Step 4b** The Environmental Planner starts the Initial Assessment and notifies appropriate county departments. This step needs to be completed within a 30-day review period. Presently the 30 days are counted from the time the application is received in the Section. Legally the review to determine if the application is complete needs to be performed from the date it is received by the department, not the section. Presently it is not unusual to take another 6 weeks from the date the project is received by the planner.

**Step 5** If the project located in the in the Coastal Zone has a biological resource, it is reviewed by Environmental Review Board (ERB) for consistency to the Coastal Act. If it is in an identified Ecological Reserve Area, the Significant Ecological Areas Technical Advisory Committee (SEATAC) reviews it. These committees advise and give direction to the Impact Analysis Section.

**Step 6a** The environmental planner determines that additional information or a special study is required.

**Step 6b** The Environmental Planner completes the environmental review of the application.

**Step 6c** The environmental planner determines that an Environmental Impact Report (EIR) is necessary.

**Step 7** The applicant submits the requested information or study(ies).

**Step 8** The planner reviews the new submittal information. The submittal may be adequate, additional information may be needed and/or corrections to the study(ies) may be required. If found adequate, the planner completes the environmental review of the application and notifies the project planner. If inadequate, additional information and/or corrections to the study(ies) is requested or an EIR is required.

**Step 9** The environmental planner prepares the Negative Declaration and related public notice.

**Step 10** The Project Planner and the consulting agencies, if any, are notified.

**Step 11** Public Notice is given regarding projects environmental status. Usually there is 45-day review period.

## **Appendix 1 – Current Planning Processes**

- Step 12** Applicant hires a consultant to prepare the EIR. In some jurisdictions the agency hires the consultant and enters into a three-way contract. There are both pros and cons to both approaches.
- Step 13** The applicant's consultant prepares, and planner reviews Notice of Preparation (NOP).
- Step 14** NOP is sent to the State Clearinghouse and consulting agencies for comments.
- Step 15** Consulting agencies respond to Notice of Preparation and identify additional issues that need to be addressed in the EIR
- Step 16** Consultant prepares draft screen check EIR.
- Step 17** The planner reviews the draft screen check EIR.
- Step 18** Corrections to the draft screen check EIR are requested.
- Step 19** Consultant revises draft screen check EIR.
- Step 20** Planner sends the draft screen check EIR to other County agencies for comments.
- Step 21** The project planner is notified. Prior to this notice and throughout the preparation of the EIR, the project planner has minimal contact with the environmental review process.
- Step 22** Notice of Availability to State Clearinghouse is posted. The draft EIR is made available to the public.
- Step 23** Impact Analysis Section receives public comments.
- Step 24** The Hearing Officer, Planning Commission and/or Board of Supervisors holds a public hearing to consider the project and any related environmental documents.
- Step 25** If no EIR, the hearing body approves the project and certifies the Negative Declaration or takes tentative action.
- Step 26** The Environmental Planner prepares final EIR with written responds to public comments, both written and public testimony from the hearing. Also included in the document is the proposed mitigation monitoring program.
- Step 27** The hearing body certifies EIR.

## **Appendix 1 – Current Planning Processes**

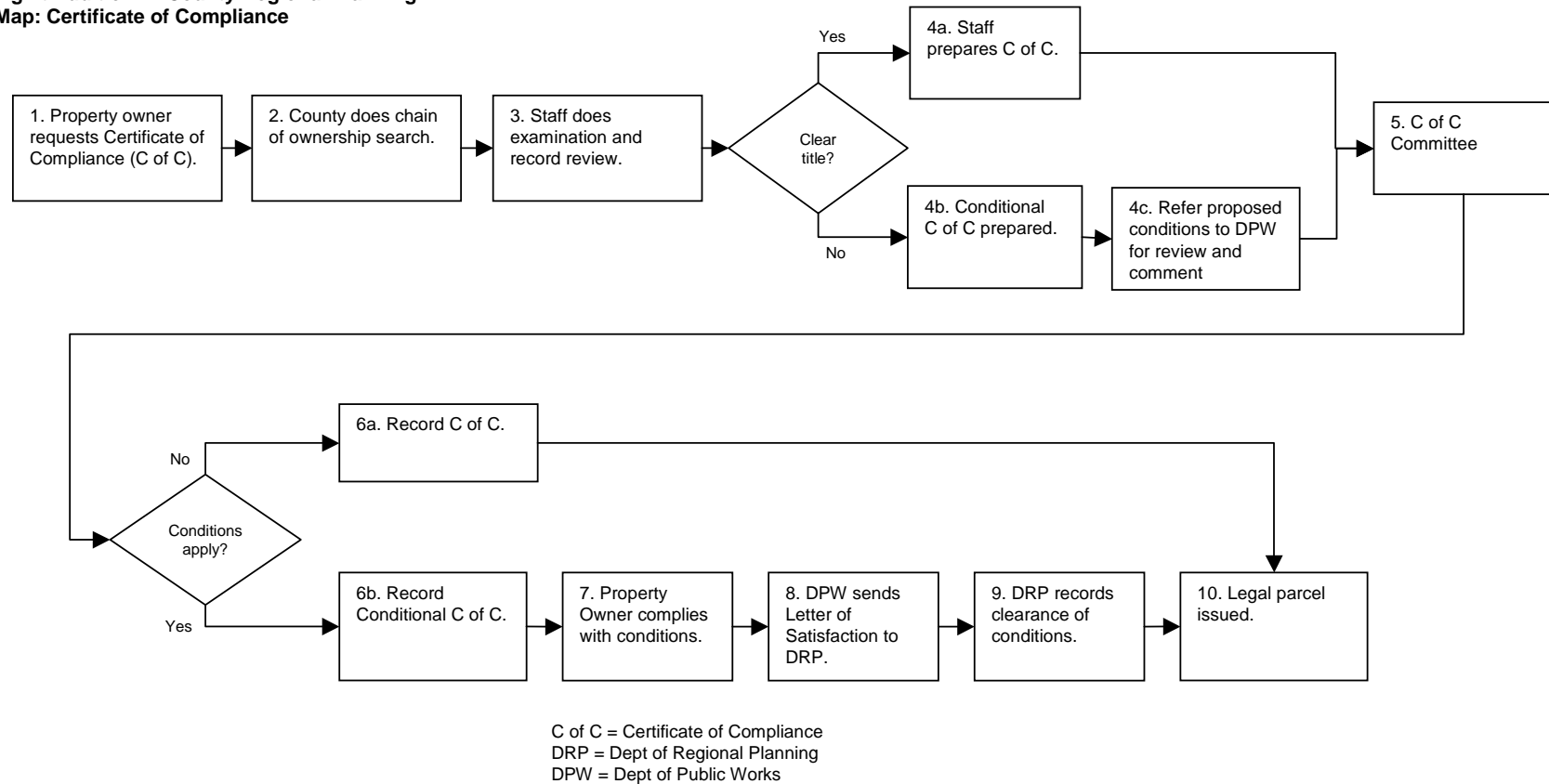
### **LAND DIVISION RESEARCH AND ENFORCEMENT**

The Land Division Research/Enforcement Section determines if a parcel of land has been legally created. If it is determined that the parcel has been created legally, a Certificate of Compliance is recorded. Figure 34, Certificates of Compliance Process, addresses each step of this process. Figure 35 identifies the process that occurs when the Planning discovers that parcel(s) have been created illegally.

## Appendix 1 – Current Planning Processes

Figure 34 – Certificate of Compliance Process

Mgmt Audit of LA County Regional Planning  
Map: Certificate of Compliance



## Appendix 1 – Current Planning Processes

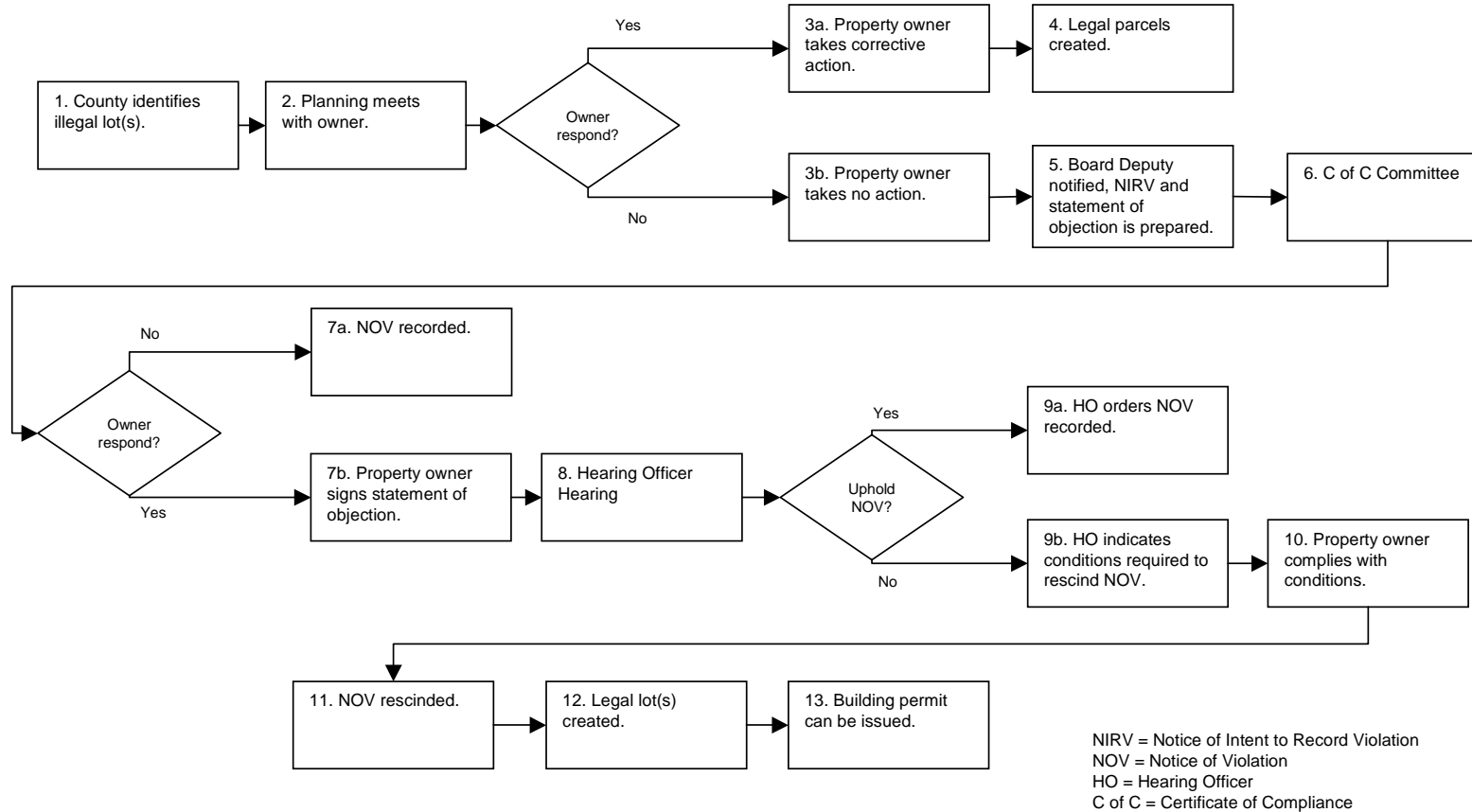
### Certificate of Compliance Process Steps

- Step 1** Property owner submits request for a Certificate of Compliance in order to prove that the parcel was created legally.
- Step 2** A title search is performed on the property to determine the chain of ownership.
- Step 3** Land Division Specialist examines the chain of ownership and reviews the record. Determining clear title involves examination of the chain of title for the subject parcel and adjoining parcels, identification of the deed or land contract that created the parcel, determination of the date of creation, how many parcels were created, what requirements were in effect when the parcel was created and what entities and individuals currently hold title to the subject parcel and the adjoining parcels.
- Step 4a** If there is a clear chain of title, a Certificate of Compliance with legal description is prepared.
- Step 4b** If the parcel was not created legally per State law, a Conditional Certificate of Compliance is prepared. Conditions typically address lack of access and dedication of public right of ways.
- Step 4c** Proposed conditions are referred to DPW for review and comment
- Step 5** Certificate of Compliance Committee meets and reviews the record. The document is signed at the meeting.
- Step 6a** A Certificate of Compliance is recorded.
- Step 6b** A Conditional Certificate of Compliance is recorded. No building will be allowed on the property until the conditions are complied with.
- Step 7** Property owner complies with the required conditions.
- Step 8** Letter of Satisfaction from Public Work is sent to Current Planning when their conditions have been complied with.
- Step 9** Department of Regional Planning records a Clearance of Conditions.
- Step 10** Certificate of Compliance is issued.

## Appendix 1 – Current Planning Processes

Figure 35 – Illegal Parcel Process

Mgmt Audit of LA County Regional Planning  
Map: Parcel Identified as Illegal



## Appendix 1 – Current Planning Processes

### Process Steps for Illegal Parcels

- Step 1** County identifies parcel(s) that have intentionally been created illegally outside the subdivision process. This determination is different from when a property owner requests a Certificate of Compliance and it is determined that the parcel was not created legally.
- Step 2** County has conference(s) with the owner and his attorney.
- Step 3a** Property owner takes one of the following actions: rescinds previously illegally issued Certificates of Compliance, signs Conditional Certificate of Compliance or files tentative parcel or tract map.
- Step 3b** Property owner takes not action.
- Step 4** Legal parcel(s) are created.
- Step 5** DRP notifies Board Deputy and sends property owner a Notice of Intent to Record Violation (NIRV) with date of Hearing Office hearing and Statement of Objection is prepared.
- Step 6** Certificate of Compliance Committee meets and NIRV is signed and sent to the property owner.
- Step 7a** Property owner does not respond to NIRV and Notice of Violation (NOV) is recorded.
- Step 7b** Property owner signs Statement of Objection.
- Step 8** Hearing Officer hears the appeal of the property owner. To date his decision has always been to support the Certificate of Compliance Committee's decision to record Notices of Violation. The property owner has the right to appeal the Hearing Officer's decision to the Planning Commission and the Planning Commission's decision to the Board of Supervisors. As of today appeal has been heard by the Planning Commission.
- Step 9a** Hearing officer orders the recordation of the NOV.
- Step 9b** Hearing Officer indicates conditions required to rescind NOV.
- Step 10** Property owner complies with conditions
- Step 11** NOV rescinded
- Step 12** Legal parcels are created.
- Step 13** Property owner may acquire a building permit.

**Appendix 1 – Current Planning Processes**

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## Appendix 2 – Current Inventory of Performance Measures

### Program: Current Planning

Measure type	Measure
Inputs	1. # of plot plans received
Outputs	2. # of plot plans reviewed 3. # of CUP applications set for public hearing 4. # of appeals of RPC decisions
Outcomes/ Quality	
Efficiency (speed & cost)	5. % of plot plan applications accepted complete first time 6. % of CUP applications accepted complete first time 7. % of plot plans completed w/in 16 weeks 8. % of CUP applications set for public hearing w/in 180 days 9. % of _____ applications submitted electronically 10. % of CUP approvals inspected after one year 11. % of environmental initial studies completed w/in 6 weeks 12. % of land divisions scheduled for committee w/in 45 days 13. % of land divisions scheduled for public hearing w/in 70 days 14. % of zoning cases scheduled for public hearing w/in 100 days 15. % of findings and conditions received w/in 6 weeks 16. % transmittals to BOS w/in 6 weeks of RPC final action 17. % of minor permits handled administratively (not appealed) 18. % of projects handled by hearing officer (not appealed) 19. % of items approved by RPC during first hearing
Access	20. Mean wait time at LDCC counter

## Appendix 2 – Current Inventory of Performance Measures

### Program: Advance Planning

Measure type	Measure
Inputs	1. # of request received for AP services
Outputs	
Outcomes/ Quality	2. # of communities covered by community or area plans 3. # of communities on wait list for new or updated community/area plans
Efficiency (speed & cost)	4. Mean elapsed time to complete community plan studies (beginning to public hearing)
Access	5. # of community outreach meetings

## Appendix 2 – Current Inventory of Performance Measures

### Program: Land Use Regulation

Measure type	Measure
Inputs	1. # of new enforcement actions
Outputs	2. # of enforcement actions closed
Outcomes/ Quality	
Efficiency (speed & cost)	3. % of new enforcement actions inspected w/in 30 days
Access	

## Appendix 2 – Current Inventory of Performance Measures

### Program: Administration

Measure type	Measure
Inputs	<ol style="list-style-type: none"><li>1. Budget (NCC and expected revenue)</li><li>2. # of GIS requests</li></ol>
Outputs	<ol style="list-style-type: none"><li>3. # hours of network downtime (office hours)</li><li>4. # of training hours</li><li>5. # of staff leaving agency</li><li>6. Actual expenditures</li><li>7. Actual revenue</li><li>8. GIS products delivered</li></ol>
Outcomes/ Quality	<ol style="list-style-type: none"><li>9. Network downtime as a percent of office hours</li><li>10. # of training hours per staffperson</li><li>11. % of technical staff with AICP designation</li><li>12. Vacancy rate</li><li>13. Mean days to fill vacancies</li><li>14. Turnover rate</li><li>15. Revenue as a % of financing uses</li><li>16. Agency actual expenditures as % of budget</li></ol>
Efficiency (speed & cost)	<ol style="list-style-type: none"><li>17. % of BOS requests (5 day letters, e-mails, etc.) responded to w/in ten days</li><li>18. Hours of overtime used</li><li>19. Elapsed time to process GIS requests</li><li>20. % of invoices paid w/in 30 days</li></ol>
Access	

## APPENDIX 3 - GLOSSARY

ACD	Automatic Call Distributor. A computer device that offers a caller menu options and routes calls.
Building Permit	A permit issued by the Building and Safety Division of DPW allowing an applicant to begin construction. Certifies that plans comply with the relevant building codes.
CAD	Computer Assisted Drafting. DRP's legacy mapping system was based on CAD technology and was called the CAD system.
California Environmental Quality Act	A State law that defines State environmental goals and the responsibilities of local governments to assist in achieving those goals and sets forth the requirements for the environmental analysis or proposed public and private projects, including the preparation and/or review of environmental impact reports or issuance of exemptions and negative declarations.
CEQA	See California Environmental Quality Act
C of C	See Certificate of Compliance
Certificate of Compliance	A legal document specifying that a lot complies with the State Subdivision Map Act and any local regulations for land subdivisions.
Community/Area Plan	Similar to a General Plan but scope is limited to a specific area within the local jurisdiction. Can contain many or all of the elements found in a General Plan.
Community Standards District	A district created by the Board of Supervisors for the purpose of implementing specific land use standards.
Conditional Use Permit	A mechanism that allows a local government the ability to permit specific land uses not otherwise allowed, as long as the landowner or business owner meets certain conditions.

CSD	See Community Standards District
CTRK	Pronounced "C-TRACK". DRP's case tracking system. Developed using a Microsoft Access platform.
CUP	See Conditional Use Permit
Directors Review	Process of reviewing and approving a land use application administratively by a DRP staffperson as opposed to referral to the Planning Commission.
Discretionary Approval	An approval by a decision making body which has legal discretion to approve or deny a project.
Discretionary Review	The process by which a decision making body considers whether to approve or deny a project.
DPW	Los Angeles County Department of Public Works
DRP	Los Angeles County Department of Regional Planning
EIR	See Environmental Impact Report
Environmental Impact Report	A detailed informational document prepared by the public agency or applicant responsible for carrying out a project as part of the CEQA process that describes and analyzes a project's significant environmental effects and discusses ways to mitigate or avoid those effects.
Environmental Review	See Impact Analysis
Exhibit A	Maps and/or plot plans that indicate changes from an original approved map/plot plan.
Final Map	A map of an approved subdivision filed in the County Recorder's office showing lot lines, street right-of-ways, easements, monuments, and distances, angles and bearings pertaining to the exact dimensions of all parcels, street lines, etc.
Fly sheet	Large maps containing the same type of information, and used for similar purposes as, house numbering maps. Fly sheets generally

	cover the more remote or mountainous areas of the County.
General Plan	Supreme document guiding future physical development of the County. Comprised of several General Plan elements.
General Plan Element	A chapter or section of a local general plan which addresses a specific topic and sets forth public policies and programs pertaining to that topic. Examples include noise, safety, circulation.
GIS	Geographic Information System. A computer system that tracks parcel boundaries and characteristics about parcels, land uses and characteristics about land.
GPS	Geographic Positioning System. A device that allows the user to accurately determine their location based on satellite navigation.
HNM	See House Numbering Map
House Numbering Map	A paper map that shows parcel boundaries, dimensions, zoning designations, right-of-ways, easements and case history for a section of the County.
Impact analysis	The process of assessing the impact of any given plan or development projects on the local jurisdiction's environment, an analysis that can range across several topics such as air pollution, toxic materials, or wildlife impacts.
Initial Environmental Review	A preliminary analysis by a local jurisdiction (e.g., County) of a proposed project to determine whether an Environmental Impact Report must be prepared or a negative declaration will be sufficient.
KIVA	A computerized permit tracking and case management system sold by the Accela Corporation.
LDCC	Land Development Coordinating Center – the public information and interface function within DRP.
LDRE	Land Division Research and Enforcement. A DRP unit that researches and processes Certificates of Compliance.

Lot Line Adjustment	Process of changing the dimensions of an approved lot.
Minor permit	Class of land use permits that do not require approval from the Planning Commission or the Board of Supervisors. Generally used for less intensive or lower impact land uses.
NAT	Nuisance Abatement Team. An interagency team of enforcement personnel that focus on specific neighborhoods to identify and mitigate code violations.
Negative Declaration	A declaration by a local jurisdiction that, based on an initial environmental Review, a project will not require an Environmental Impact Report.
NOV	See Notice of Violation.
Notice of Violation	An legal notice, specified in County ordinances, specifying the nature of a code violation, required mitigation measures and a penalty for non-compliance.
One Stop	A meeting convened by representatives of DRP and DPW to review an applicants plans prior to submitting a formal application in order to identify issues and offer suggestions. Also refers to the practice of co-locating functions from various departments (e.g., DRP and DPW) so that customers can conduct business with all appropriate agencies during one visit.
Parcel	A legally recognized lot.
PDA	Personal Digital Assistant. A hand-held computer device. Palm Pilots are a typical example.
Plan Check	Reviewing an applicants building plans for conformance with building or zoning codes.
Parcel Map	A map depicting the establishment of up to four new lots by splitting a recorded lot.
Quasi-judicial Act	A decision that applies legislative policy to individual development projects, much as a court might apply legal precedents to a particular case.
RPC	Regional Planning Commission.

SCM	Subdivision Review Committee. Committee of County staff that reviews subdivision applications for compliance with the Subdivision Map Act and other local regulations such as the County Zoning Ordinance.
Specific Plan	A special set of development standards that apply to a particular geographical area.
Subdivision Map Act	A State law that establishes the procedures local governments must use when considering the subdivision of land.
Tentative Map	The initial map setting forth in detail a proposed land subdivision, which must comply with the County's subdivision and zoning regulations and the State Subdivision Map Act.
Variance	A variance which permits a landowner to construct a building or open a business without having to comply with the standards required of other landowners in the same zone.
Zoning Ordinance	A law dividing all land in a city or county into zones that specifies uses permitted and standards required in each zone.



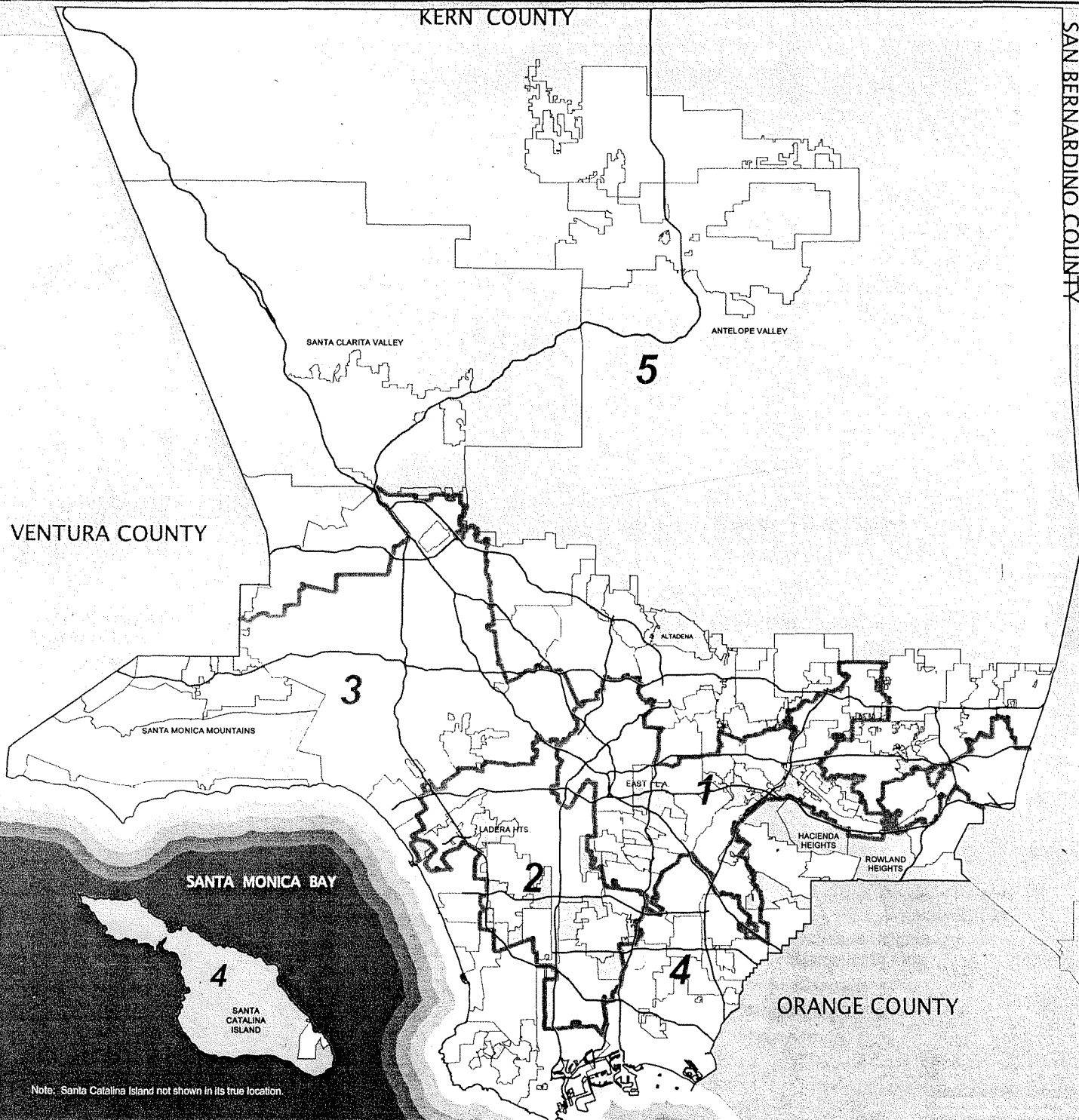
## APPENDIX 4 – COUNTY MAPS

1. Unincorporated areas and supervisorial districts
2. Community and area plans
3. Community Standard Districts

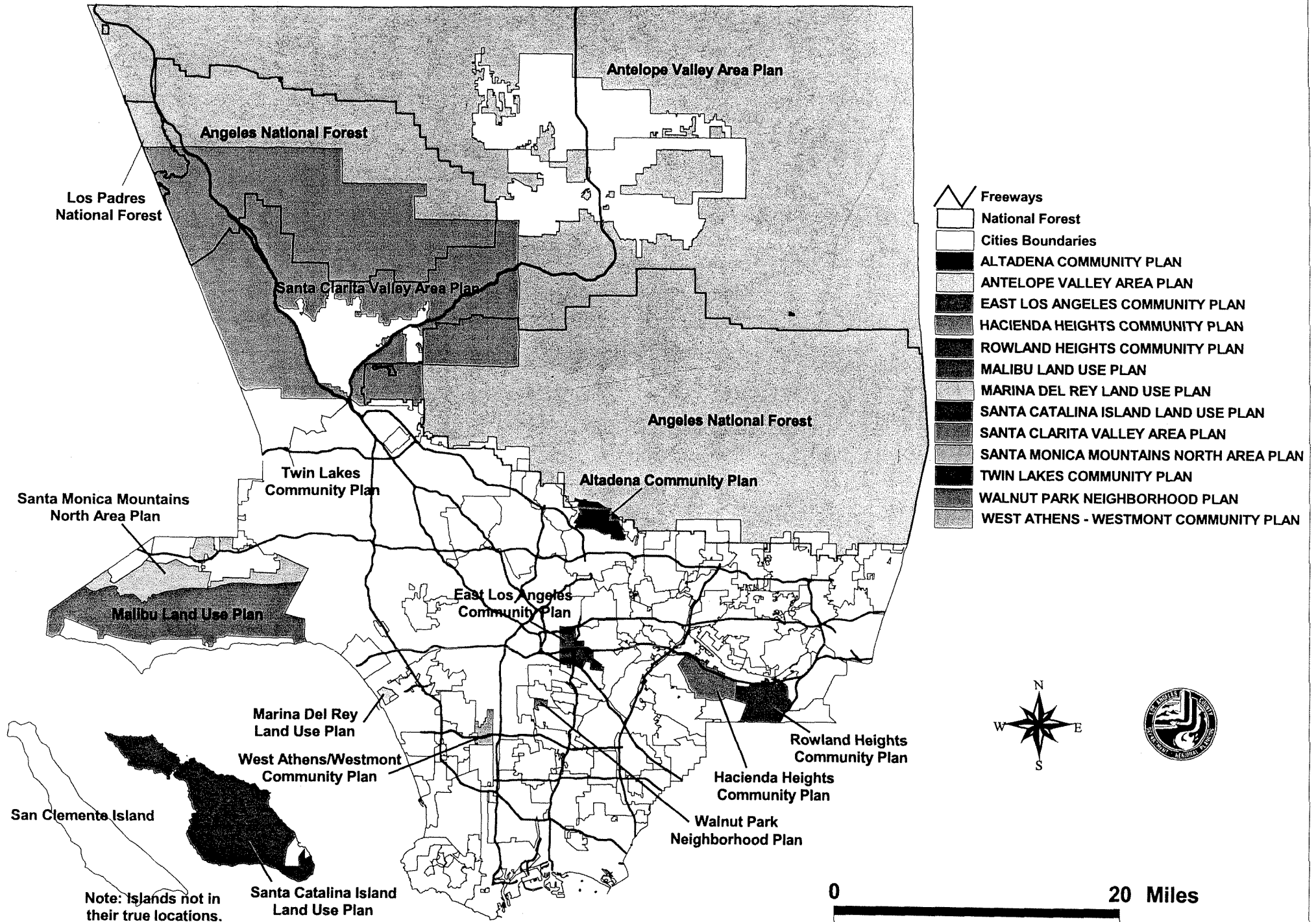
# LOS ANGELES COUNTY

*Unincorporated Areas and  
Supervisory Districts*

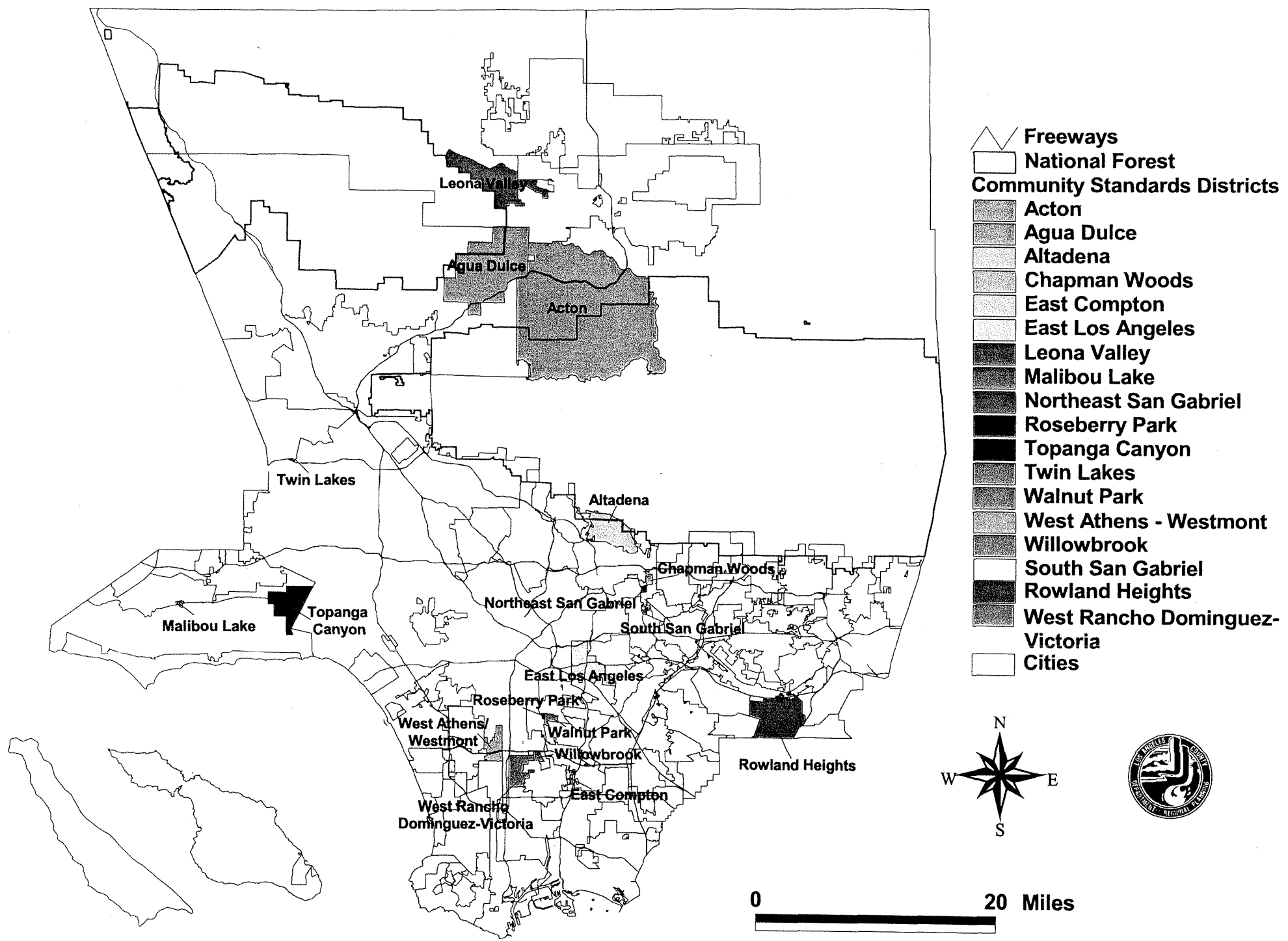
*Dept. of Regional Planning*



# Community and Area Plans - Los Angeles County



# Community Standards Districts - Los Angeles County



January 14, 2003

Mr. Tyler McCauley  
Department of Auditor-Controller  
525 Kenneth Hahn Hall of Administration  
500 W. Temple Street  
Los Angeles, CA 90012

Dear Mr. McCauley:

#### **INTERIM RESPONSE TO MANAGEMENT AUDIT**

We have reviewed the Management Audit of the Department of Regional Planning, and offer the following comments:

We generally concur with many of the findings and recommendations. We also are encouraged that the document recognizes the department's continued service excellence in most programmatic areas despite budget curtailments and staff shortages. The report also highlights critical areas where major funding commitments may be required to successfully achieve the Board of Supervisors' goals and objectives to provide the highest quality service to the citizens of Los Angeles County.

A number of actions suggested in the audit have already been initiated and are in the process of being implemented. Additional actions will be taken as the result of our Strategic Plan and Board direction. As we noted in our response, some of the actions involving staffing, consultants, reallocation of resources or compensation issues will require Board approval prior to implementation.

The department enjoyed a productive working relationship with the Auditor-Controller during the course of the management audit and we thank all your staff involved in its preparation.

We appreciate the management review performed by Strategica and the Auditor-Controller's audit team and look forward to working with the Chief Administrative Office and the Board of Supervisors to identify priorities and resources necessary to implement the audit's recommendations.

Mr. Tyler McCauley  
January 14, 2003  
Page 2

The department will provide a detailed response to the Board in 90 days, including a strategy to implement the appropriate recommendations and, when possible, an estimate of the additional resources that will be needed to implement corrective actions.

Please call me if you have any questions. If I am not readily available, your staff may contact Mr. Jon Sanabria, Chief Deputy, at (213) 974-6405.

Very truly yours,

DEPARTMENT OF REGIONAL PLANNING

James E. Hartl, AICP  
Director of Planning

JS:cb

Attachment

c: Board of Supervisors  
Each B/S Deputy  
David Janssen, CAO  
Violet Varona-Lukens, Executive Officer

File: Aud-cont